



ENVIRONMENTAL ASSESSMENT  
BUILDING 4133 and BUILDING 4143  
HISTORIC BUILDING DEMOLITIONS  
BARKSDALE AIR FORCE BASE  
LOUISIANA

PREPARED BY  
AFCEC FOR 2 CES/CEAO  
BARKSDALE AIR FORCE BASE  
JUNE 2013

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## **FINDING OF NO SIGNIFICANT IMPACT (FONSI)**

### **INTRODUCTION**

#### **Description of the Proposed Action**

The proposed action will demolish Buildings 4133 and 4143 on BAFB, Louisiana.

#### **Alternative to the Proposed Action**

The alternative to the proposed action would be to remodel and reuse both buildings.

### **SUMMARY OF ENVIRONMENTAL IMPACTS**

Implementing the proposed action would have the following anticipated impacts:

**Land Use.** The existing land use is Industrial/Commercial. The proposed action will change Land Use to Open Space.

**Air Quality.** Implementation of the proposed actions on BAFB would generate short-term air emissions associated with clearing and demolition activities. All emissions associated with the proposed project would be temporary and as such are not regulated in areas currently in attainment with NAAQS (Northwest Region). Particulate air emissions as a result of the proposed actions would be temporary and negligible; therefore, impacts to air quality would not be significant. Determination of conformity to the State or Federal Implementation Plans is not required.

**Climate and Hydrology.** Undertaking the proposed actions is not expected to impact surface and groundwater resources of the region. The proposed action is not near any groundwater drinking wells. It is not located near or in any wetlands or floodplains.

**Solid and Hazardous Waste/Materials.** No significant impact due to hazardous waste or materials is expected in conjunction with the proposed actions. No hazardous waste is generated by the proposed action, and solid waste (ACM) would be mitigated by following procedures outlined in AFI 32-1052 .

**ERP.** No official ERP site is located at the site of the proposed action. However, because Building 4143 was formerly used as an ordnance shop, then a motor pool maintenance shop and finally as an auto hobby shop, there are some records of the following waste being deposited around the building: MOGAS filters, water with fuel, parts washer fluid, paint waste, antifreeze and aerosol cans.

**Topography, Geology and Soils.** None of the proposed actions would have an effect on topography and soils. By clearing the land there would be some removal of soils and slight topographic changes would occur. This action would be minimal, and after landscaping is completed, soil stabilization would occur.

**Biological Resource Issues.** The proposed actions will not affect biological resources. No threatened or endangered species will be harmed or removed. There will be no impact to hunting, fishing or other biological resources.

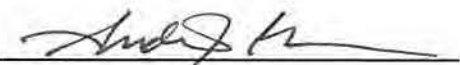
**Cultural Resource Issues.** The proposed action is sited within the boundaries of the Barksdale Historic District which is listed on the National Register of Historic Places. Demolition will result in the removal of the buildings. The action is mitigated by the preparation of HABS reports which will be filed in the Library of Congress for permanent retention. An MOA was signed with the Louisiana SHPO, and a Section 106 consultation was properly followed. There are no known archaeological sites within the demolition activity zone. If an inadvertent discovery is made of Native American human remains or funerary items, an SOP is in place for the proper procedures to be followed according to Caddo Nation wishes and NAGPRA regulations. The Caddo Nation was contacted to advise them of the proposed action, but no comments were received from them.

**Noise Issues.** Only demolition activity will increase noise levels. This activity will be short-lived, and effects are minimal and transitory.

**Socioeconomics/Environmental Justice.** No socioeconomic adverse effects would occur because of this action. No disproportionately high or adverse human health impacts to minority and/or low-income populations have been identified. The base complied with the stipulations of the McKinney-Vento Homeless Assistance Act (Public Law 100-77, July 22, 1987) by offering these building as shelters for indigents. However, they were deemed unsuitable because of age, deterioration and the inaccessibility of coming on-base for non-DoD ID card holders.

**Transportation.** Since the proposed action site is located in a lightly traveled area, and no affect on transportation is anticipated.

**FONSI:** On the basis of the findings of this Environmental Assessment conducted in accordance with the requirement of the National Environmental Policy Act, the Council on Environmental Quality Regulations, and Air Force Instruction 32-7061 as promulgated in 32 Code of Federal Regulations Part 989, and after careful review of the potential impacts of the proposed action and no-action alternative, I find that there would be no significant impact on the quality of the human or natural environment from the implementation of the proposed action or no-action alternative described in the EA. Therefore, I find there is no requirement to develop an Environmental Impact Statement.



ANDREW J. GEBARA, Col, USAF  
Commander, 2d Bomb Wing

28 JULY 2013

Date

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## **1.0 PURPOSE OF AND NEED FOR PROPOSED ACTION**

This Environmental Assessment (EA) evaluates the potential impacts on environmental and human resources from the proposed action. This EA conforms to the requirements of the National Environmental Policy Act (NEPA) and the Air Force's Environmental Impact Analysis Process (EIAP) implementing NEPA. Section 1.1 of the EA describes the purpose and need for the proposed action.

### **1.1 Purpose and Need For the Proposed Action**

The action is necessary in order to reduce Barksdale AFB's physical presence by 20 percent by 2010 (U.S. Air Force Civil Engineer Strategic Plan). The plan focuses on limited time and funding which is available due to extreme infrastructure limitations necessitated by a realignment in the Air Force (AF). The mission of the AF can only be sustained by diverting resources away from excess, obsolete and under-utilized infrastructure. A view of the buildings on the property can be found in Figure 1 and Figure 2.

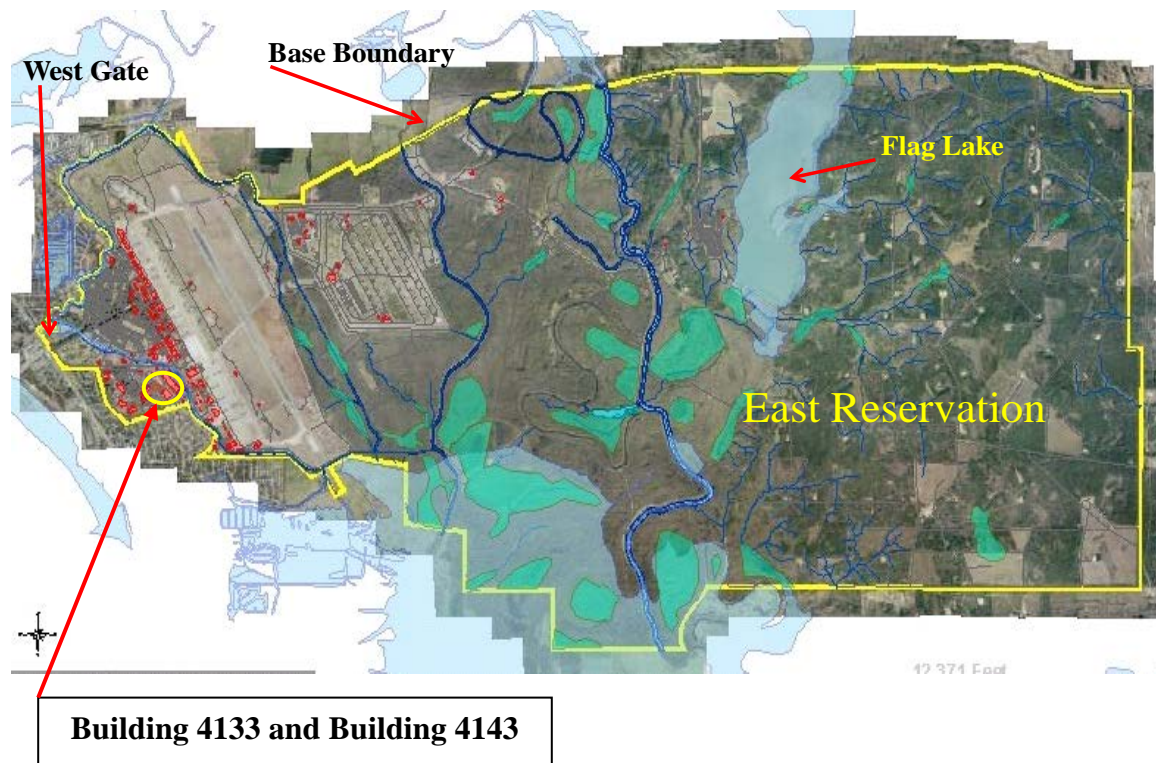


**Figure 1 - Building 4133**

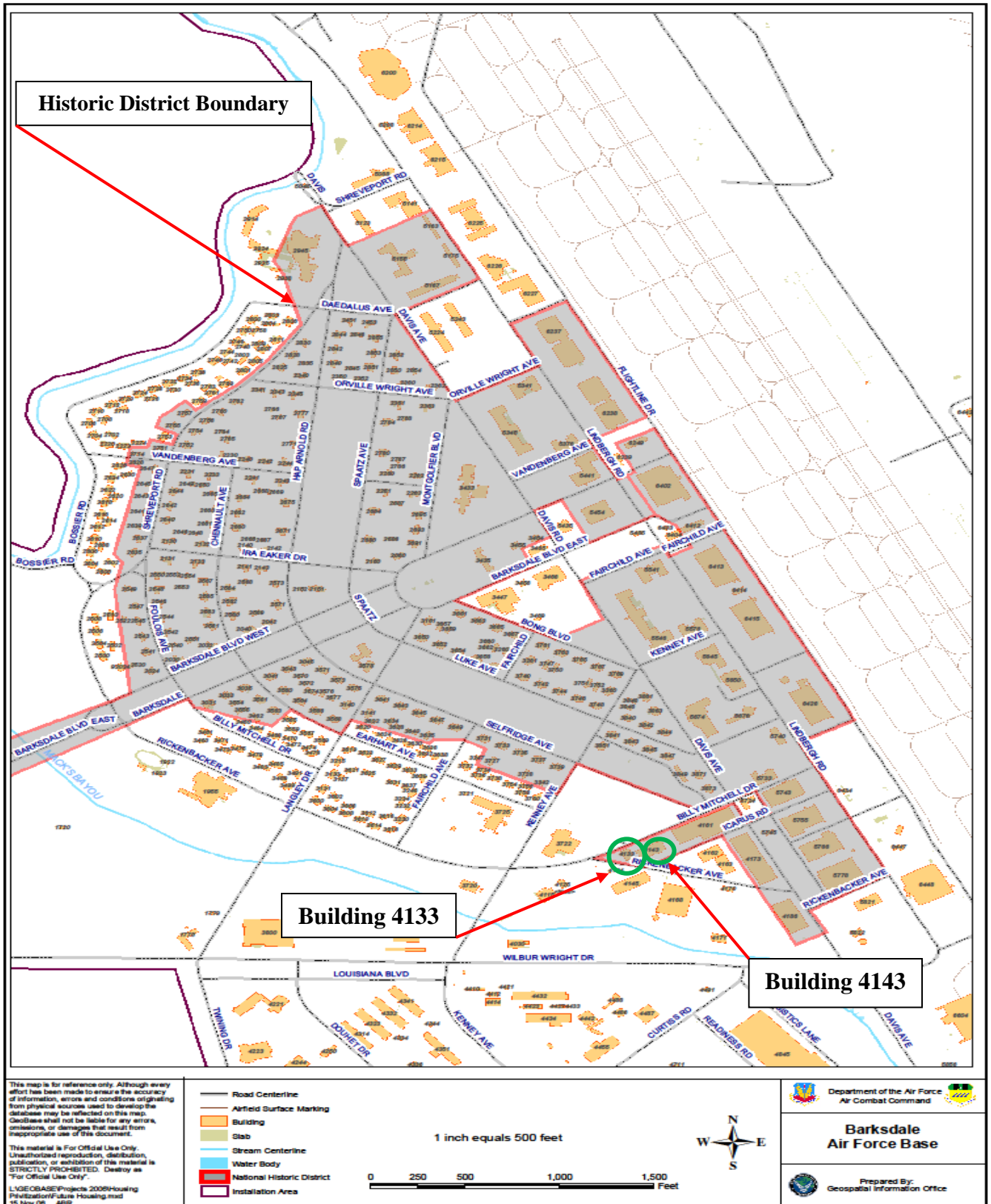




**Figure 2 – Building 4143**



**Figure 3 - Location of the Proposed Actions**



**Figure 4 – Location of the Proposed Actions Within the Historic District**

## **2.0 DESCRIPTION OF THE PROPOSED ACTIONS AND ALTERNATIVES**

Chapter 2.0 describes the proposed actions in detail as well as alternatives to the proposed action.

### **2.1 Proposed Action**

The proposed actions will be the demolition of each building. The areas will be converted to Open Space after their demolition. This area will then revert to a grassy surface.

### **2.2 Alternative Action**

The alternative action for the proposed actions is to remodel the buildings for future office space. The newly remodeled space would be upgraded to 21<sup>st</sup> century building standards completely up to safety codes. The approximate remodeling cost could be \$500,000 for each building.

### **2.3 No-Action Alternative**

The no-action alternative would be to not demolish them and to leave them in an unused and unmaintained condition.

## **3.0 AFFECTED ENVIRONMENT**

### **3.1 Introduction**

Chapter 3.0 succinctly describes the relevant resources of the areas that would be affected by the proposed actions if they are implemented. This chapter describes the baseline conditions against which the decision-maker and the affected public can compare the effects of all proposed actions.

### **3.2 Barksdale AFB Location, History and Current Mission of Installation**

#### Location

BAFB is located in the northwest portion of Louisiana within the Shreveport-Bossier City metropolitan area. The metropolitan area is one of the largest in Louisiana, with a population of 199,311 for Shreveport and 61,315 for Bossier City (Census Data, 2010). Shreveport/Bossier City falls within the Ark-La-Tex region, which extends into southwest Arkansas, northwest Louisiana, and northeast Texas. BAFB, occupying 21,802 acres, is bounded by Louisiana Highway 71 on the west and U.S. Highway I-20 on the north (Figure 3). Areas surrounding the base are zoned for both residential and commercial use.

#### History

BAFB is named in honor of Lieutenant Eugene Hoy Barksdale, Air Corps, U.S. Army, who lost his life in 1926 while flight testing an observation-type airplane, near McCook, Ohio. BAFB, originally Barksdale Field, was dedicated in 1933 and marked the culmination of 5 years of effort

by the local citizenry to attract the U.S. Army Air Corps to the site. During the 1930s, BAFB operated as a training facility for pursuit and fighter crews, however, this operation was phased out in the 1940s in favor of training for bomber crews. BAFB became part of Strategic Air Command in 1946. In the 1950s, BAFB was the home of the first USAF all-jet strategic bombing, refueling and reconnaissance aircraft, including the B-52 Stratofortress and the KC-135 Stratotankers. Throughout the 1980s and until 1994, BAFB operated the KC-10 aerial refueler. With the 1992 reorganization of the major USAF commands, BAFB joined Air Combat Command (ACC). Barksdale became a part of the new Air Force Global Strike Command (AFGSC) in August 2009.

### Current Mission

Barksdale AFB is the home of the Eighth Air Force Headquarters and the 2d Bomb Wing, the largest bomber unit in AFGSC. It is also the home base for AFGSC.

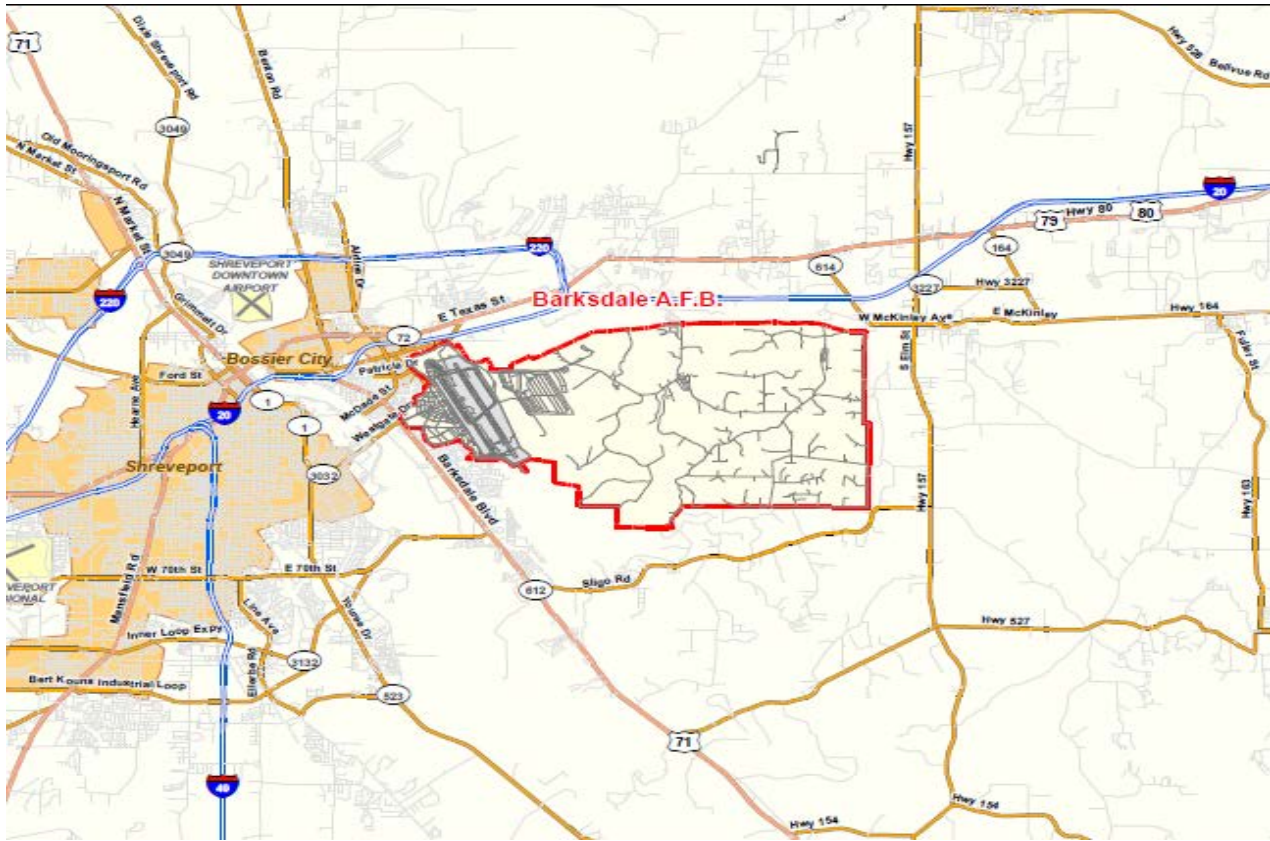
The Eighth Air Force Headquarters is responsible for the direct deployment of more than 250 bomber, fighter and transport aircraft. In addition to 11 active-duty locations, the Eighth Air Force oversees 27 Air National Guard and Air Force Reserve units in 16 states, as well as 10 mobile Air Combat Command units in six states.

The 2d Bomb Wing is the host unit at BAFB, and has operated here since 1 April 1963. As the largest bomb wing in AFGSC, the wing controls 48 B-52H Stratofortress Bombers assigned to three squadrons. The 20th Bomb Squadron and 96th Bomb Squadron train combat aircrews, maintain combat readiness to support ground commanders in worldwide theater contingency operations and support the Air Force's deterrent role by standing ready to strike specified targets. The 11th Bomb Squadron conducts academic, simulator and flight training for all initial, qualification, re-qualification and instructor upgrade of B-52 aircrews.

The wing maintains a state of constant readiness to conduct strategic bombardment operations on a global scale and continues to reflect the heritage of its motto "Liberty We Defend."

The AFGSC Mission is to "develop and provide combat-ready forces for nuclear deterrence and global strike operations, Safe-Secure-Effective, to support the President of the United States and combatant commanders".





**Figure 5 - Location of Barksdale Air Force Base**

### 3.3 Description of Area

The area covered by this EA is located at 480 Icarus Road (Building 4143) and 490 Icarus Road (Building 4133), Barksdale Air Force Base situated in Bossier City, Bossier Parish, State of Louisiana (Figure 4). Coordinates of the building are: Latitude: 32° 29'53" and Longitude: 93°40'35" (Building 4143) and Latitude: 32° 29'53" and Longitude: 93°40'36" (Building 4133). Building 4133 is in the southwest corner at the edge of the boundary of the Historic District. To the north is a grassy area. To the east is Building 4143 (also listed on the NRHP). To the south is Rickenbacker Avenue, located outside the Historic District, and to the west is open space. Surrounding current land use in all directions is industrial/commercial. Both buildings are currently vacant. Building 4143 is bounded on the north by Billy Mitchell Drive, on the east by Building 4161 (listed on the NRHP). On the south by Rickenbacker Avenue, and on the west by Building 4133 (listed on the NRHP).

### 3.3.1 Physical Resource Issues

#### 3.3.1.1 Land Use

BAFB covers an area of 21,802 acres. Primary land use is divided into three distinct areas: (1) the Main Cantonment area (west of the runway), (2) Barksdale East (East Side industrial area) and (3) the East Reservation. Land use is divided into 12 categories. AFI 32-7062 establishes and defines these categories and the principal uses allowed in each particular category. After review of historical aerial photographs and internal documentation, previous land use of subject area appears to be industrial/commercial from the construction date of May, 1934 (Constructing Quartermaster letter to the Commander, May 1934) up to the current date. Building 4133 was abandoned in April, 2011. Building 4143 was abandoned in May, 2012.

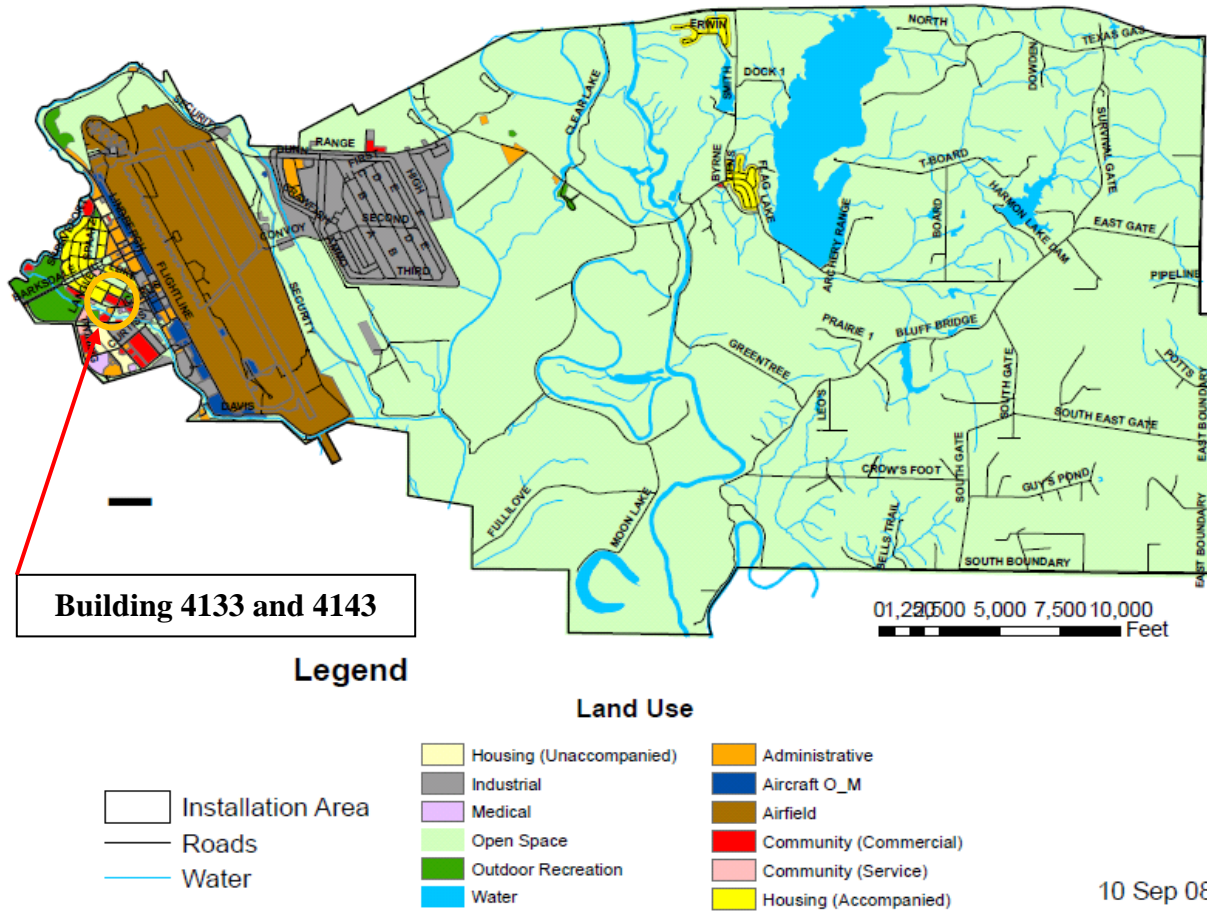
A summary of base land use categories is shown in Table 1. A map of land use is shown in Figure 6.

CATEGORY	ACRES	PERCENT	USES
Airfield	1,525	7.0	Runway, taxiway, apron
Aircraft O&M	97	0.4	Aircraft maintenance, AGE, operations, crew readiness
Industrial	901	4.1	Base supply, vehicle maintenance, CE, fuel storage, POL operations
Administrative	141	0.6	Education, wing/group HQ, 8AF HQ, civilian personnel, squadron admin operations
Community (Commercial)	97	0.4	Commissary, AAFES, open mess, gymnasium, theater, bowling center, hobby shops, youth center
Community (Services)	13	0.1	Post office, library, chapel, education center,
Medical	16	0.1	Hospital, dental clinic, area clinics
Housing, Accompanied	220	1.0	MFH units
Housing, Unaccompanied	26	0.1	VOQ, VAQ, BAQ, dormitories, transient facilities
Outdoor Recreation	142	0.6	Softball fields, tennis courts, football field, parks/picnic areas, FamCamp, pools, golf course
Open Space	16,450	75.0	Conservation areas, forest, safety clearance/security areas, utility easements
Water	2,317	11.0	Ponds, lakes, streams, forest wetlands
Total	21,802	100	BAFB Total Area

Source: *Barksdale Air Force Base General Plan*, January 2013

### **Table 1 - Land Use Categories**





**Figure 6 - Land Use on Barksdale Air Force Base**

### 3.3.1.2 Air Quality

The affected air quality for the proposed action alternative and other alternatives will be similar due to BAFB's location in Northwest Louisiana Region. The region is in full attainment for all criteria pollutants under the National Ambient Air Quality Standards (NAAQS). Air quality in a given location is described by the concentration of various pollutants in the atmosphere. NAAQS are established by the Environmental Protection Agency (EPA) for criteria pollutants including ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), particulate matter equal to or less than 10 micrometers in diameter (PM<sub>10</sub>) and particulate matter equal to or less than 2.5 micrometers in diameter (PM<sub>2.5</sub>). NAAQS represent the maximum levels of background pollution considered acceptable, with an adequate margin of safety to protect the public health and welfare. The NAAQS are depicted in Table 2. The Louisiana Department of Environmental Quality (LDEQ), Air Quality Division (AQD), adopted these same NAAQS for implementation of its air quality program.

POLLUTANT	UNIT	AVERAGING TIME	NAAQS
O <sub>3</sub>	ppm	8 hr	0.08
CO	mg/m <sup>3</sup>	1 hr 8 hr	40 10
NO <sub>2</sub>	ppb	AAM <sup>a</sup>	53
SO <sub>2</sub>	ppm	3 hr 24 hr AAM <sup>a</sup>	0.5(c) 0.14 0.030
PM <sub>10</sub>	µg/m <sup>3</sup>	24 hr AAM	150 50
PM <sub>2.5</sub>	µg/m <sup>3</sup>	24 AAM	65 15

<sup>a</sup> - Annual Arithmetic Mean

<sup>b</sup> - Arithmetic Mean

c- National Secondary Ambient Air Quality Standard

**Table 2 - National and Louisiana Ambient Air Quality Standards**

### 3.3.1.3 Climate and Hydrology

BAFB is near the western margin of a broad region of the southeastern United States having a humid, subtropical climate. The parish (parish is an area designation similar to county) in which BAFB is located is dominated by warm, moist, maritime tropical air from the Gulf of Mexico. This air is displaced frequently during winter and spring by incursions of continental polar air from Canada, which usually last no longer than 3 to 4 days. These incursions of cold air occur less

frequently in autumn and rarely in summer. Rainfall is evenly scattered throughout the seasons, averaging 46.6 inches annually. The mean daily maximum temperature is 65.8°F.

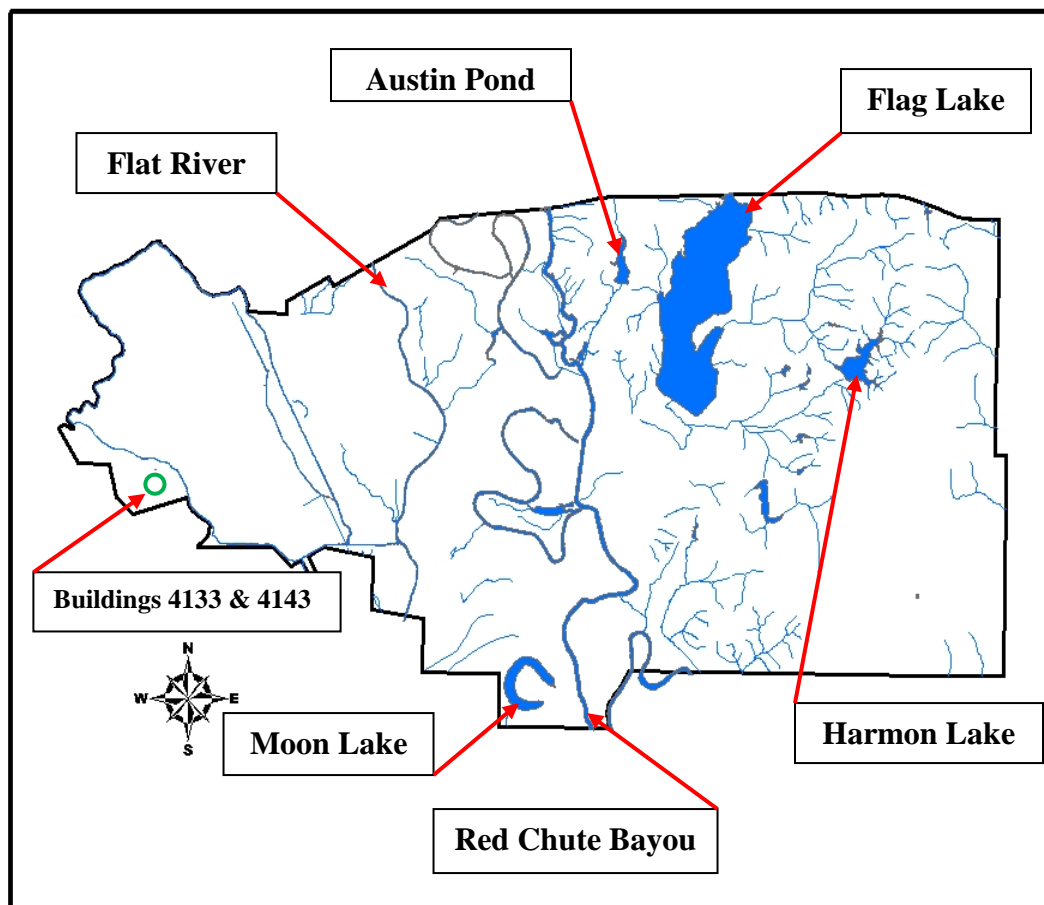
The majority of water resources at BAFB are located in the eastern half of the base. Major water resources in this area are: Flat River, Red Chute Bayou, Flag Lake, Harmon Lake and Moon Lake. Water resources are depicted in Figure 7. The water resources in the western half of the base are approximately 80 acres and are primarily limited to Mack's Bayou, Cooper's Bayou and storm drainage channels. BAFB is approximately one mile east of the main channel of the Red River, which dominates the surface hydrology of the area. There are no major water bodies close to the proposed action location.

Potential groundwater supplies are available from the sands of Tertiary and Quaternary ages. The Wilcox Group is the major source of fresh ground water in Caddo Parish. It ranges in thickness from less than 1 foot to almost 400 feet. Generally, water from the Wilcox Group is clear, odorless and soft to moderately hard and has a high percentage of sodium. The top of the Red River alluvial aquifer ranges from 10 to 60 feet below the ground surface. Water levels within the alluvial aquifer are responsive to the adjacent surface water bodies. Some recharge occurs from the underlying Wilcox-Carrizo Aquifer, but most of the recharge is derived from the infiltration of precipitation and, to a lesser extent, from local streams. The silt and clay upper member of the alluvium holds groundwater and occasionally acts as the lower confining layer for a limited perched water table. Discharge from the aquifer occurs by natural process into nearby surface water bodies. Regional groundwater flow within the alluvium at BAFB is to the south and west, toward the Red River. The proposed action does not occur in a wellhead protection area.

#### 3.3.1.4 Solid and Hazardous Waste/Materials

Although no asbestos survey has been conducted on these buildings because of their age, it can be assumed that Asbestos Containing Material (ACM) occurs within each of them. Removal of the ACM must be conducted according to Occupational Safety and Health Administration (OSHA) standards which will include daily area air sampling. Workers in the regulated area must wear negative pressure air-purifying respirators, and there should also be critical barriers, drop clothes below work areas, establishment of a decontamination /equipment area, wet methods, high-efficiency particulate air (HEPA) vacuums and prompt cleanup (AFI 32-1052). Construction debris, solid wastes and medical wastes are disposed of by contract off base. The base has been assured the local landfill will be able to meet projected growth for the next 10 years. Hazardous Waste (HW) generated by BAFB is stored on base at various satellite accumulation points. It is then transferred to the 90-day Central Accumulation Point (CAP) until it can be disposed. Hazardous Materials (HM) used by base personnel are issued and reissued through a central supply facility called the Hazardous Material Pharmacy (HAZMART). This facility tracks all HM from purchase to disposal. BAFB must comply with all federal, state and local regulations concerning the use, storage and reporting of Hazardous Materials (HM). In accordance with AFI 32-7086, Hazardous Materials Management, users of HM will provide the HAZMART office, 2 LRS/LGRDMH, a list of all HM, a copy of each material's Material Safety Data Sheet (MSDS), an estimate of how much material will be used, amount stored, and location on the facility prior to the start of work.

Prior to beginning any process, that will generate HW, the user will notify the Asset Management Flight (2 CES/CEA) of the proposed action, the duration of the action and the amount of waste, that will be generated. All HW will be handled and stored in strict compliance with federal, state and local regulations. Users will be held fully liable for any negligence that results in a Notice of Violation or other penalty. Proper management of any waste generated, Hazardous or Nonhazardous, will be the responsibility of the user. The base will dispose of HW generated by the user on BAFB. Any shipment of HW will be documented on a HW Manifest and signed by a CEA representative. The generator's copy of the manifest will be kept at CEA. No hazardous waste has been found in or around the buildings.



**Figure 7 - Location of Major Water Resources on Barksdale Air Force Base**

### 3.3.1.5 Environmental Restoration Program

The Barksdale AFB Environmental Restoration Program is divided into three program categories: the Installation Restoration Program (IRP) now known as the Environmental Restoration Program (ERP) category, the Military Munitions Response Program (MMRP) category and the Compliance Restoration Program (CRP). The ERP category includes response actions at sites that are primarily impacted by release of hazardous substances, hazardous wastes, petroleum, oil, and lubricants, and other contaminants. The MMRP category concerns munitions response actions that address unexploded ordnance (UXO) and munitions constituents.

#### ERP Sites

The Environmental Restoration Program (ERP) addresses releases of hazardous substances, pollutants, and contaminants to the environment to protect human health and the environment, and correct other environmental damage (such as detection and disposal of unexploded ordnance (UXO) on other than operational ranges) that creates an imminent and substantial endangerment to the public health or welfare or to the environment. The ERP at Barksdale AFB is a three-tiered program consisting of the Installation Restoration Program (IRP), the Military Munitions Response Program (MMRP), and the Compliance Restoration Program (CRP).

The ERP started at Barksdale with a base-wide Records Search to identify hazardous substances, pollutants, and contaminants in soil and groundwater at formerly utilized sites where suspected release had occurred prior to December 1986. Supplemental investigations and administrative actions have resulted in a total number of 38 sites being investigated and cleaned up under the IRP. Of these 38 sites, 12 are listed on Barksdale's Hazardous Waste Corrective Action permit as Solid Waste Management Units (SWMUs). The sites include bomb ranges, disposal pits, spill areas, storage tanks, fire training areas, landfills, wastewater treatment plants, and radiological waste. Primary contaminants in soil and water include fuels, metals, waste solvents, debris, oils, sludges and radiological waste. The following identifies the status of these sites:

- 27 sites have achieved Site Closeout with Unlimited Use/Unrestricted Exposure.
- 6 sites have been accepted by the LDEQ for no further action status, with Land Use Controls (LUCs) covering the low level contamination left in place.
- 5 sites require removal actions and/or long-term monitoring.

The MMRP was created in 2002 and addresses UXO, discarded military munitions (DMM), Munitions of Explosive Concern (MEC), or munitions constituents (MC) at formerly used munitions areas. Investigations of these areas identified 24 sites, including 12 multi-use range areas, 11 small arms/rifle/skeet ranges, and one disposal pit. Primary contaminants include metals and Poly Aromatic Hydrocarbons. The following identifies the status of these sites:

- 11 sites have been recommended for No Further Action Required
- 4 sites require additional investigation and/or remediation

- 7 sites have been proposed for surface and focused subsurface MEC clearance with long-term administrative LUCs
- 2 sites are entering the Preliminary Assessment/Site Inspection phase.

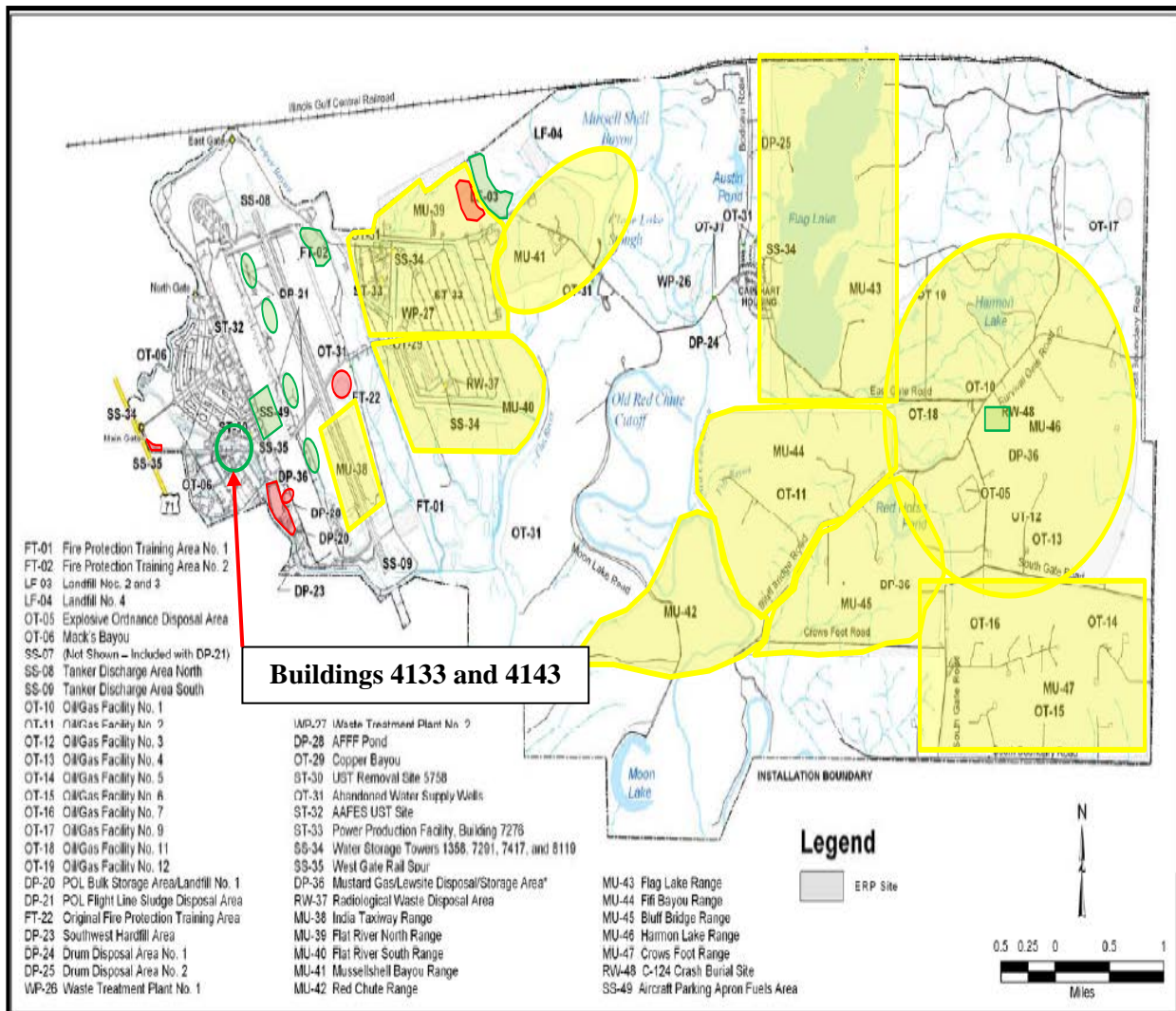
The CRP was created in 2009 to identify sites where a documented or suspected release of hazardous substances, pollutants, and contaminants had occurred after December 1986. Although these “compliance” cleanup sites were not originally considered eligible for inclusion in the ERP due to their recent incident date, recent changes in program definition has allowed inclusion of new sites. Initial record searches have identified 45 sites for inclusion in the CRP.

Locations of all ERP sites on Barksdale AFB can be found in Figure 8. The proposed action is not located near any ERP sites. Both buildings were evaluated in studies conducted by the ERA program. Building 4143 had an oil/water separator system below ground which was attached to the north side of the building. It was removed in 1998. Soil sampling was conducted at this site, and contaminants were found which exceeded limits set by the EPA. They were (in ppb): Acetone 192, Chromium 10,000, Di-n-butyl Phthalate 824, Lead 6310 and Napthalene 20,000. Semi-Volatile Organics sampled in 1995 include: Arsenic, Chromium and Lead. Because contamination was localized and of small concentrations this site was not deemed eligible for further study under the ERA program. (Final Site Visit Report for Investigation of Oil Water Separators..., AECOM, Oct 2011)

#### 3.3.1.6 Topography, Geology and Soils

BAFB is located in the western Gulf Coast Plain in northwestern Louisiana. The area consist of flat to rolling plains in the eastern portion giving way to flat alluvial plains in the west. The base ranges from 115-ft mean sea level (msl) along the Red River floodplain to 336-ft msl in the northeast uplands. Natural drainage is generally southward and well developed. The land at the proposed action area is 166-ft msl. Foundation type for both buildings is a raised concrete slab approximately 30 in above grade.

BAFB lies within three physiographic regions: Tertiary uplands, Pleistocene terraces and Red River alluvial plains. Each region is characterized by soils formed in a different age or type of parent material. The Tertiary uplands on the eastern side of the base are sedimentary deposits consisting of material ranging in texture from sand to clay. These are old deposits laid down in former extensions of the Gulf of Mexico. The Pleistocene terrace uplands are alluvial surfaces that were deposited as a Red River fluvial plain during the Pleistocene Epoch. The Red River alluvium, which lies along the western side of the base, consists primarily of water-laid sediments transported by the Red River. These sediments are predominantly materials derived from erosion of the older Permian red beds, resulting in their characteristic red colors. The proposed action occurs in the alluvial plains with a slight to moderate erosion hazard. The region of influence is not subject to earthquakes or earthslides.



**Figure 8 - Location of all ERP sites on Barksdale Air Force Base**

### 3.3.1.7 Biological Resource Issues

Biological resources include native plants and animals in the region on and around BAFB. Presently, BAFB comprises 21,802 acres of natural vegetation, 17,301 acres of which is dominated by forested communities. Bottomland hardwoods make up approximately 7,600 acres of these forested areas. Additionally, approximately 2,400 acres of wetlands have been restored as seasonal wetlands in an effort to recreate the natural water level and flow. The extent and variety of BAFB wetlands contribute significantly to wetland functions and values of Louisiana's freshwater wetlands. The Vicksburg District of the United States Army Corps of Engineers (USACE) has jurisdictional authority over BAFB wetlands. The two primary non-wetland waters of the U.S. located on base are Mack's Bayou and Cooper's Bayou. Mack's Bayou is the primary drainage feature of the cantonment area and is fed by Cooper's Bayou east of the flightline. Generally, the 100-year flood plain follows drainage ways with elevations less than 160 feet above Mean Sea Level (MSL).

BAFB falls within the Lower Mississippi Riverine Forest province. The primary plant communities for this region include the oak-gum-cypress bottomlands, in which most wetlands occur, and the pine-oak-hickory-maple forest, which dominates the uplands. Seven plants listed on the state rare list and ten uncommon "watch list" plants have been located on the base.

Mammalian fauna found in this ecological subregion include white-tailed deer, bobcat, gray fox, raccoon, cottontail rabbit, swamp rabbit, gray squirrel, fox squirrel, striped skunk and many small rodents and shrews. Foxes are living on the base golf course near the proposed and alternative action areas. These animals are sometimes seen on the course and in nearby housing areas but almost never go near the main entrance because of traffic flow. Game bird populations here include turkey, bobwhite quail, waterfowl and mourning dove. Ibis, cormorants, herons, egrets and kingfishers are common in flooded areas. Common songbirds of this area include red-eyed vireo, northern cardinal, tufted titmouse, wood thrush, summer tanager, blue-gray gnatcatcher, hooded warbler and Carolina wren. Reptiles include the alligator, box turtle, cottonmouth, common garter snake and copperhead.

There are no federally listed threatened, endangered or candidate species considered year-round residents on BAFB by the U.S. Fish and Wildlife Service. Additionally, no state listed threatened or endangered species have been identified on base. However, there are several species listed as rare or "of concern" by the Louisiana Natural Heritage Program. Nesting bald eagles have been documented at BAFB in the Flag lake area. The bald eagle falls under the protection of the Bald and Golden Eagle Protection Act. Trees around the lakeshore are protected from cutting to provide future nesting sites. There is potential for the federally endangered red-cockaded woodpecker to exist on base, as potential habitat exists on base and known colonies of this species have been identified in the areas surrounding the base. Species of concern identified as occurring on BAFB by The Nature Conservancy of Louisiana include the Bachman's sparrow and the Cooper's hawk.

Neither threatened nor endangered species are located in the proposed action areas. There are also no rare or uncommon plants on the site. Typical fauna found on the base are shown in Table 3.



**Table 3 - Typical Fauna Species Occurring at Barksdale Air Force Base**

<b>COMMON NAME</b>		<b>SCIENTIFIC NAME</b>
	<b><u>BIRDS</u></b>	
Eastern Wild Turkey		<i>Meleagris gallopavo silvestris</i>
Northern Bobwhite Quail		<i>Colinus virginianus</i>
Mourning Dove		<i>Zenaida macroura</i>
American Crow		<i>Corvus brachyrhynchos</i>
Mallard		<i>Anas platyrhynchos</i>
Blue-winged Teal		<i>Anas discors</i>
Gadwall		<i>Anas strepera</i>
American Widgeon		<i>Anas americana</i>
Lesser Scaup		<i>Aythya affinis</i>
Hooded Merganser		<i>Lophodytes cucullatus</i>
Wood Duck		<i>Aix sponsa</i>
Great Egret		<i>Casmerodius albus</i>
Snowy Egret		<i>Egretta thula</i>
Cattle Egret		<i>Bubulcus ibis</i>
Great Blue Heron		<i>Ardea herodias</i>
Little Blue Heron		<i>Egretta caerulea</i>
Black-crowned Night-Heron		<i>Nycticorax nycticorax</i>
Yellow-crowned Night Heron		<i>Nycticorax violaceus</i>
Green-backed Heron		<i>Butorides striatus</i>
White Ibis		<i>Eudocimus albus</i>
American Anhinga		<i>Anhinga anhinga</i>
Red-eyed Vireo		<i>Vireo olivaceus</i>
Northern Cardinal		<i>Cardinalis cardinalis</i>
Tufted Titmouse		<i>Parus bicolor</i>
Wood Thrush		<i>Hylocichla mustelina</i>
Summer Tanager		<i>Piranga rubra</i>
Blue-gray Gnatcatcher		<i>Polioptila caerulea</i>
Hooded Warbler		<i>Wilsonia citrine</i>
Carolina Wren		<i>Thryothorus ludovicianus</i>
	<b><u>MAMMALS</u></b>	
White-tailed Deer		<i>Odocoileus virginianus</i>
Gray Squirrel		<i>Sciurus carolinensis</i>
Fox Squirrel		<i>Sciurus niger</i>
Cottontail Rabbit		<i>Sylvilagus floridanus</i>
Swamp Rabbit		<i>Sylvilagus aquaticus</i>
Beaver		<i>Castor canadensis</i>
Nutria		<i>Myocastor coypus</i>
River Otter		<i>Lutra canadensis</i>
Bobcat		<i>Lynx rufus</i>
Common Raccoon		<i>Procyon lotor</i>
Coyote		<i>Canis latrans</i>

## **REPTILES/AMPHIBIANS**

American Alligator  
Copperhead  
Cottonmouth  
Water snakes  
King snakes  
Rat snakes  
Bullfrog

*Alligator mississippiensis*  
*Agkistrodon contortrix*  
*Agkistrodon piscivorus*  
*Nerodia* sp.  
*Lampropeltis* sp.  
*Elaphe* sp.  
*Rana catesbeiana*

## **FISH**

Largemouth Bass  
Black Crappie  
Bluegill  
Redear Sunfish  
Channel Catfish  
Blue Catfish

*Micropterus salmoides*  
*Pomoxis nigromaculatus*  
*Lepomis macrochirus*  
*Lepomis microlophus*  
*Ictalurus punctatus*  
*Ictalurus furcatus*

### **3.3.1.8 Cultural Resource Issues**

The Integrated Cultural Resources Management Plan for BAFB provides guidelines and procedures that will enable the base, an AFGSC installation, to meet its legal responsibilities for the identification, evaluation and treatment of historic properties under its jurisdiction.

By definition, cultural resources that have been evaluated and identified as eligible for inclusion in or formally listed on the National Register of Historic Places (NRHP) are considered to be "historic properties." These historic properties may be archeological sites (both prehistoric and historic), buildings, structures, objects and districts. Resources of potential NRHP eligibility are those resources for which the NRHP evaluation process has not yet been undertaken or has not yet been completed. Such resources must be treated as eligible for the NRHP until a final determination has been made.

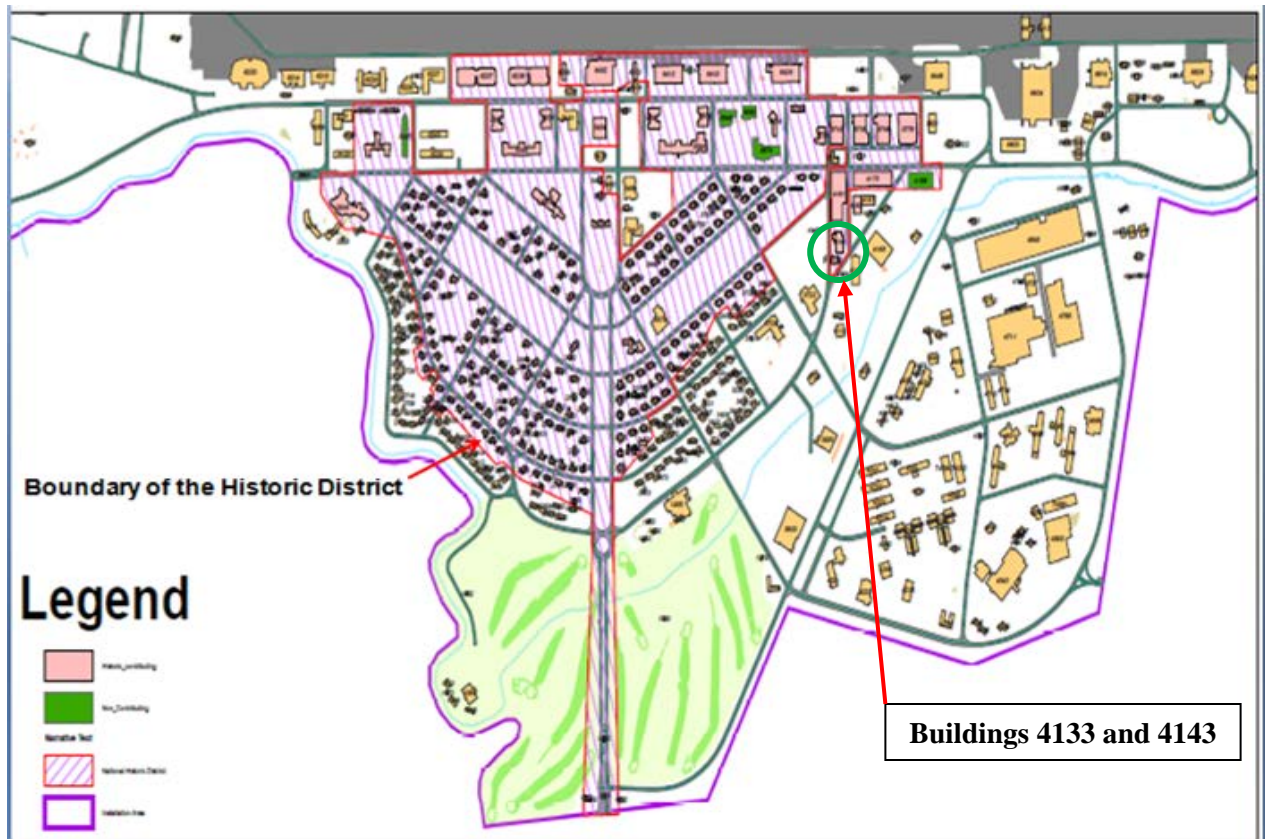
#### **Historic District**

BAFB's history and significance was recognized when the state of Louisiana created a National Historic District in 1992 (Figure 9). The district is unique for its properties as well as its planning. BAFB's plan is based on a Beaux-arts radial pattern developed by landscape engineer Captain Norfleet G. Bone and his assistant, Mr. Hugh K. Harris, landscape architect. Plant materials native to the area, such as live oaks, were used in the landscape design. The structures of the historic district were built between 1930 and 1941 in the French Colonial Revival Style and are characterized by terra-cotta and stucco walls, tripped and gabled red tile roofs, French windows and wrought iron rails. In addition to being architecturally significant, many of the houses in the district have been home to distinguished military families. Some of the more distinctive commercial properties are also historically significant.

The historic district encompasses many different building types with varying maintenance issues associated with age and use. These problems are compounded by the unique maintenance and repair procedures that must be followed to retain the historic qualities of these properties. In September 2009, all Military Family Housing was conveyed to a private developer via a 50 year land lease for their ownership and stewardship. The proposed action area is located within the boundaries of the Historic District.

**Building 4133** This building is currently abandoned. Built to service all the bakery goods needs of Barksdale Field in 1934, the facility was in use until after World War II when it became a meeting space for assorted scout units, Federal Employees Union, Morale Welfare and Recreation storage for non appropriated funds sale items, and finally operations center for Barksdale's custodial contractor. Barksdale Field (later Barksdale AFB) was established in 1930 with the unifying architectural theme of French Revival, however the bakery does not adhere to this theme being built in a more utilitarian and functional style. The construction of Barksdale Field began in 1931 with the bakery being completed on 30 April 1934. Original Plans and construction: War Department QMC form 117 dated 30 April 1934, list the original building as being 30'x 66' and having a total square footage of 1980 at a cost of \$19,008.41 USD (1934). A 15'x 66' "Mixing Room" with storage area was added to the building in 1940 increasing the square footage by 990 square feet. The entire structure is of hollow tile and stucco construction. The original roof is gambrel style with gable ends, the 1940 additions is a flat roof. While the bakery was built in a more utilitarian style, it does share features drawn from French styles including sandstone sills on windows, stucco finish and a Gambrel style roof (original structure).

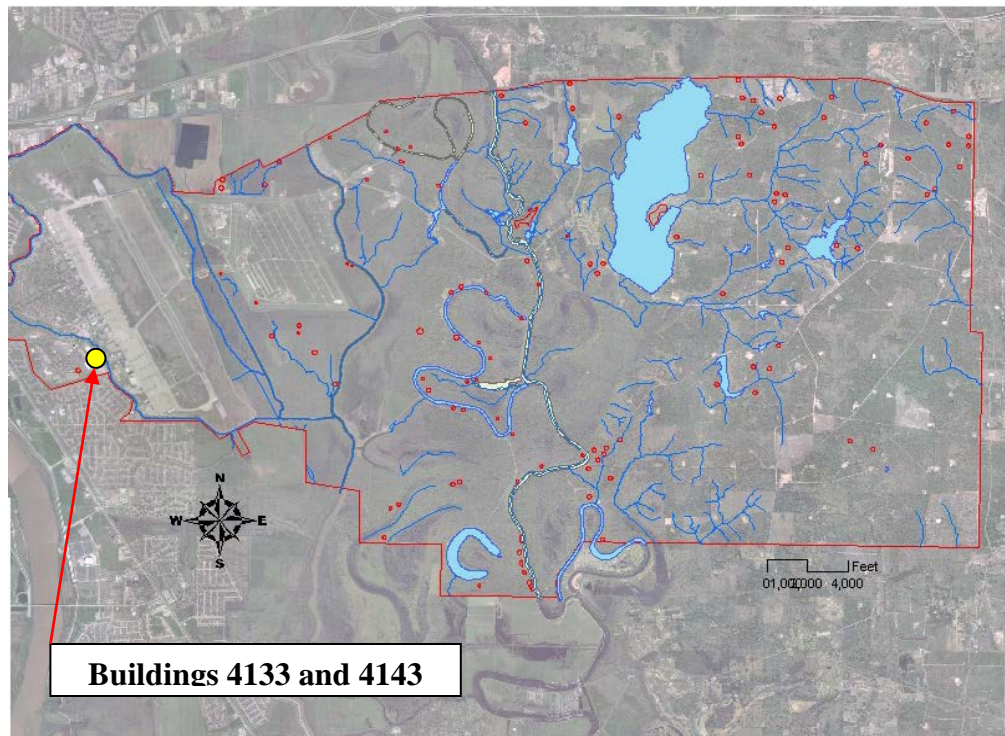
**Building 4143** This building is currently abandoned. It was built as an ordinance storage area for munitions used by the 3<sup>rd</sup> Attack Group. Construction was completed on 29 May 1934. Originally constructed as an ordinance warehouse, the building served in that capacity for several years. In 1960 it was converted to covered storage, later converted again to a motor pool maintenance shop, and finally the Auto Hobby Shop for Barksdale Air Force Base. The building was vacated in May 2012 when operations were shifted to a newly constructed facility. Original Plans and construction: War Department QMC form 117 dated 29 May 1934, lists the original building as being 65'11" x 122'10" and having a total area of 8,097 square feet, cost of \$21,700.00 USD (1934). The entire structure is of hollow tile and stucco construction with a steel decking, 3 ply asbestos gambrel style roof with gable ends.



**Figure 9 – Barksdale Historic District**

### Archaeological Sites

From July 1995 through April 2009, four Phase I and three Phase II archaeological surveys were conducted over an area of approximately 16,705 acres. Phase I surveys are initial reconnaissance studies to determine if anything significant may be present. Phase II surveys go into further detailed studies and make a final determination on the eligibility of sites for the National Register of Historic Places (NRHP). These surveys found a total of 120 sites, of which, 18 could have been potentially eligible for nomination to the NHRP. Of these 18 sites, three are prehistoric (before the arrival of the Europeans), 13 are historic and two are both prehistoric and historic. The 18 sites have been studied under Phase II investigation in FY99-10. Two prehistoric sites are quite large and could be remnants of Indian villages (Caddo Tribe). Consultation with the Caddo Indian Tribe has been initiated on the prehistoric sites. Of the remaining 18 sites, 2 are now considered eligible for nomination to the NRHP (both are prehistoric sites). The locations of all 120 sites are shown in Figure 10. The site of buildings 4133 and 4143 has not been surveyed for the presence of archaeological materials. The proposed actions are not located near any known archaeological sites.

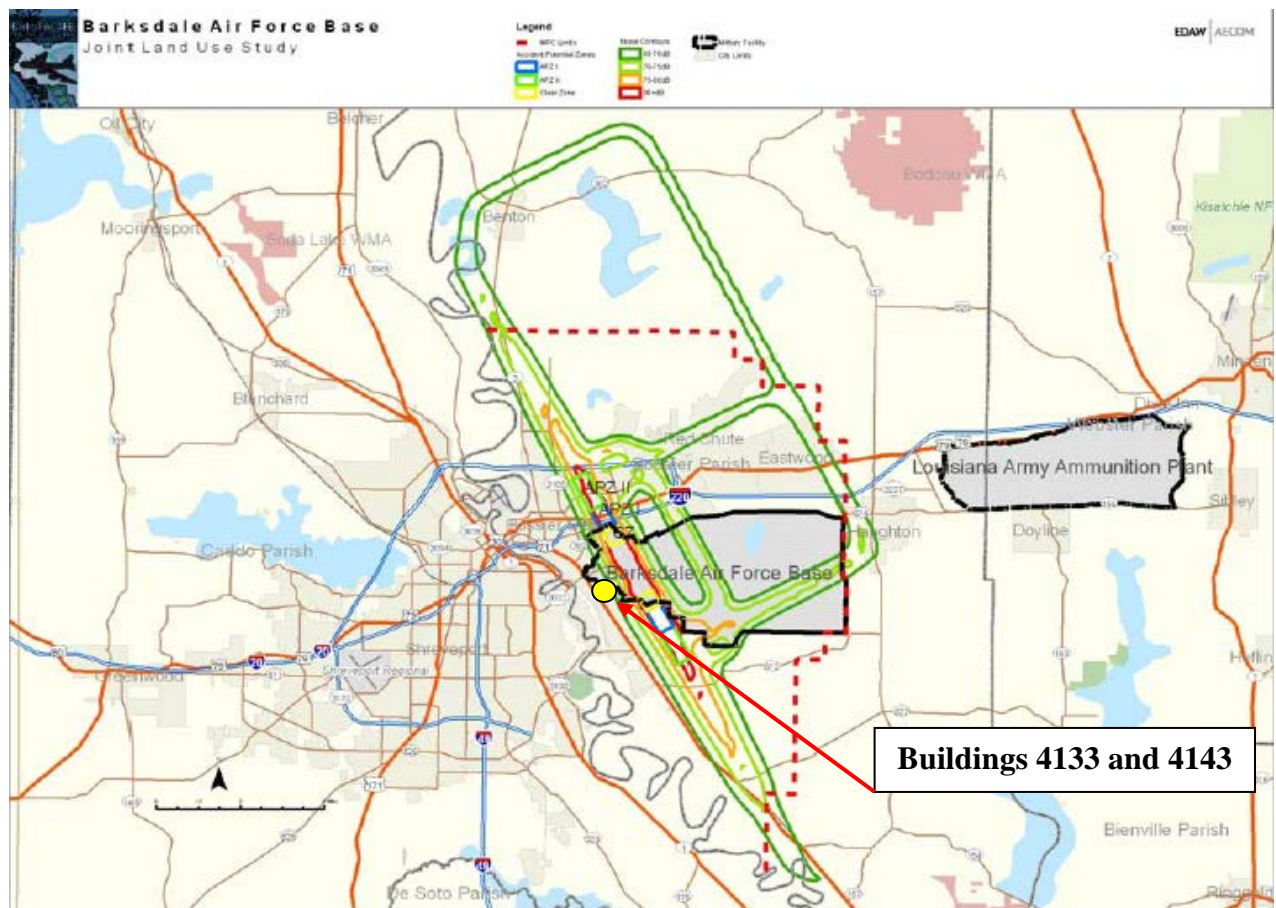


**Figure 10 Location of Archaeological Sites Discovered During Phase I and II Studies**

### 3.3.1.9 Noise Issues

The purpose of the Air Installation Compatible Use Zone (AICUZ) program is to promote compatible land development in areas subject to aircraft noise and accident potential. Air Force AICUZ land use guidelines reflect land use recommendations for clear zones, accident potential zones I and II and four noise zones. This is depicted in Figure 11. These guidelines have been established on the basis of studies prepared and sponsored by several federal agencies, including the Department of Housing and Urban Development, Environmental Protection Agency, Air Force and state and local agencies. The guidelines recommend land uses that are compatible with airfield operations while allowing maximum beneficial use of adjacent properties. The Air Force has no desire to recommend land use regulations that render property economically useless. It does, however, have an obligation to the inhabitants in the BAFB environs and to the citizens of the United States to point out ways to protect the people in adjacent areas as well as the public investment in the installation itself. The Air Force system for describing the noise environment is the Day-Night Average A-Weighted Sound Level (DNL). The average DNL occurring in the proposed action site is 70-74 decibels and above (dB).





**Figure 11 - Barksdale Air Force Base Noise Contours**  
Values are in decibels (dB)

#### 3.3.1.10 Socioeconomics/Environmental Justice

Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, was issued on February 11, 1994. The EO requires federal agencies to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations. A Presidential memorandum that accompanied EO 12898 specified that federal agencies “shall analyze the environmental effects, including human health, economic and social effects, of Federal actions, including effects on minority communities and low-income communities, when such analysis is required by the National Environmental Policy Act of 1969 (NEPA), 42 U.S. Code Section 4321et seq. The memorandum further stated that federal agencies “shall provide opportunities for community input in the NEPA process, including identifying potential effects and mitigation measures in consultation with affected communities and improving the accessibility of meetings, crucial documents, and notices.”

Although a rigorous Environmental Justice Analysis is more appropriate for the production of an EIS a rudimentary analysis was conducted for this EA, and the process can be found in Appendix H.

The base-related population living in the Shreveport-Bossier City area consists of nearly 8,000 military personnel (active and reserve) and family members (with over 5,000 living off base) and 1,800 civilian employees. There are also over 15,320 base-related family members living on and off base. In addition, up to 60,000 retirees and their family members live within a 100-mile radius and use base services, including the hospital, base exchange, golf course and commissary, each year. (Defense Enrollment/Eligibility Reporting System – DEERS, 2012)

BAFB interaction with the community has been significant since its inception in 1933. Government spending in the local area for construction and build-up of the base was the primary contributor to the Shreveport-Bossier City economy through the Great Depression.

BAFB continues to be a major factor in the growth of Shreveport and Bossier City with a total economic impact of approximately \$584 million, with approximately \$336 million going to annual payroll and over \$154 million going to total annual expenditures. In addition, estimated annual dollar value of jobs created is over 94 million.

#### 3.3.1.11 Transportation

The efficiency of Barksdale AFB’s internal transportation system, including road access on and off base is good. The majority of the roads are in the western side of the base. All streets are grouped into three classifications: arterial streets, collector streets and local streets. Four arterial streets provide access to all points in the western side of Barksdale AFB. All streets in the east side of the base are classified as local streets with the exception of Range Road, which is classified as a collector street.

### **4.0 ENVIRONMENTAL IMPACT**

Section 4.0 evaluates the environmental impact of implementing the proposed, alternative, and no-action alternatives.

## **4.1 Proposed Action**

### 4.1.1 General

The proposed action would result in the demolition of Buildings 4133 and 4143. Since total square footage of both buildings is 11,067 square feet, this would help the base achieve 24.9% of the 2013 requirement of space reduction. (Richard Parent, personal communication, 2013)

### 4.1.2 Land Use

The existing land use is Industrial/Commercial. An additional 11,067 square feet will be reduced on the base by demolition of the buildings. The proposed action will affect land use by changing it to Open Space.

### 4.1.3 Air Quality

Implementation of the proposed action on BAFB would only generate short-term air emissions if there are demolition activities. All emissions associated with the proposed project would be temporary and as such are not regulated in areas currently in attainment with NAAQS (Northwest Region). Particulate air emissions as a result of the proposed action would be temporary and negligible; therefore, impacts to air quality would not be significant. Mitigation of adverse effects of the demolition would occur by wetting the area during the activity. In compliance with 40 CFR Part 93, the proposed action must be evaluated to address the potential need for preparation of an air quality conformity analysis. A conformity analysis is required if a federally proposed action is to take place in an existing nonattainment area and the increase in air emissions exceeds the rate outlined in 40 CFR 93.153, applicability, paragraph (b)(1). BAFB is located in an attainment area and the proposed action would result in no estimated increases in long-term emission factors on base. As a result, determination of conformity to the State or Federal Implementation Plans is not required.

### 4.1.4 Climate and Hydrology

Undertaking the proposed actions is not expected to significantly impact surface and groundwater resources of the region. Demolition activities may introduce suspended solids in drainage run-off. Storm water management will be provided to minimize suspended solids by constructing temporary diversion terraces, installing silt fencing and only removing vegetation necessary for construction activities. The proposed action is not near groundwater drinking water wells. Additional vegetation and landscaping will also reduce adjacent water contamination. No water detention will be required.

### 4.1.5 Solid and Hazardous Waste/Materials

Although no asbestos survey has been conducted on these buildings because of their age, it can be assumed that Asbestos Containing Material (ACM) occurs within each of them. Removal of the ACM must be conducted according to Occupational Safety and Health Administration (OSHA) standards which will include daily area air sampling. Workers in the regulated area must wear negative pressure air-purifying respirators, and there should also be critical barriers, drop clothes below work areas, establishment of a decontamination /equipment area, wet methods, high-efficiency particulate air (HEPA) vacuums and prompt cleanup (AFI 32-1052). No significant impact due to hazardous waste or materials is expected in conjunction with the proposed action.



#### 4.1.6 ERP

The proposed action will not significantly impact any ERP sites because no Official ERP site is located at the site of the proposed area. Because the area was sampled in 2008/2009, a determination was made that no significant contamination was present in the soil, and, therefore, no further DERA action was required (Final Evaluation Report, Volume II, Air Force Compliance Clean-up Sites, Identification and Evaluation of Defense Environmental Restoration (DERA) Eligibility).

#### 4.1.7 Topography, Geology, and Soils

The proposed action would enhance the area by “greening” it after demolition is completed because the area will be converted to Open Space. The effects of this action should be positive.

#### 4.1.8 Biological Resource Issues

The proposed action will not affect biological resources. There are no listed threatened or endangered species or plants in the area of the proposed action.

#### 4.1.9 Cultural Resources

The proposed action will result in the demolition of the buildings. A HABS level Report has been prepared for each building. They were submitted to the National Park Service (Atlanta Regional Office) (NPS) on Feb 24, 2013. They were approved by the NPS on \_\_\_\_\_. (Appendix A). A comprehensive Memorandum of Agreement (MOA) was promulgated between the Air Force and the SHPO on 26 Nov 2012 (Appendix B). The Advisory Council on Historic Preservation (ACHP) was invited to participate in the consultation, but chose not to do so (Appendix C). The HABS was an integral part of the MOA, and was submitted as a mitigation to the Adverse Effect. The HABS will be submitted to the Library of Congress for permanent retention and reference. The area has not been surveyed for any possible archaeological resources. This is because this part of the base has been extensively built up over the years and most scientists believe all archaeological contexts have been lost, and, therefore, any study would be worthless. The Caddo Nation was informed of this action via a letter dated \_\_\_\_\_.

#### 4.1.10 Noise

Increased noise levels due to demolition activities are expected. This activity will be short-lived, and effects should be minimal and transitory. The proposed action site has a noise level of 70-74 dB (decibels) and above.

#### 4.1.11 Socioeconomic/Environmental Justice

Demolition costs for each building are \$30,000 for Building 4143 and \$55,000 for Building 4133 (AF ACES database, 2013). No socioeconomic adverse effects would occur because of this action. No disproportionately high or adverse human health impacts to minority and/or low-income populations have been identified. (Demographics for Army and Air Force Customers in AAFES Market Area, Defense Enrollment/Eligibility Reporting System – DEERS, 2012). The base complied with the stipulations of the McKinney-Vento Homeless Assistance Act (Public Law 100-77, July 22, 1987) by offering these building as shelters for indigents. A Title V report was filed with the U.S. Department of Housing and Urban Development for each building, and they were deemed unsuitable because of age, deterioration, and the inaccessibility of coming on-base for non-DoD ID card holders.

No environmental impacts are anticipated as a result of the proposed action. The project would result in ground disturbance of less than 1 acre of land, located entirely within the boundaries of Barksdale Air Force base. The ground disturbance will be very small. There are no wetlands, threatened or endangered species present in the project area. Noise and air emissions (primarily PM<sub>10</sub> as fugitive dust) would not impact any residents or workers, and these effects would be short-term and temporary. Standard demolition practices would be implemented to minimize dust. No hazardous substances would be stored or transported to the site. There are no surface water bodies near the site. Because there would be no adverse environmental impacts, and the environmental justice analysis showed that the census tract does not have a disproportionately high percentage of low-income residents, the conclusion is no low-income or minority groups will be affected by the proposed action.

#### 4.1.12 Transportation

Since the proposed action site is located in a lightly traveled area, no affect on transportation is anticipated.

### **4.2 Alternative Action**

#### 4.2.1 General

An alternative to the proposed action would be to remodel and upgrade the buildings to make them compliant with Force Protection, Safety, and Americans With Disabilities Act (ADA) compliant as a modern office space. Leadership in Energy and Environmental Design (LEED) Green Building Rating Systems would be utilized in the remodeling.

#### 4.2.2 Land Use

Land use would change from industrial (Building 4143) to entirely commercial for the two buildings. Remodeling of the buildings would defeat the purpose of the 2020 Plan by continued use of the building while the Air Force wishes to diminish square footage through a more efficient expenditure of energy and material resources.

#### 4.2.3 Air Quality

There would be only minor and transitory impacts to air quality while the buildings were remodeled.

#### 4.2.4 Climate and Hydrology

Climate and hydrology would not change under this alternative because the external features of the building would not change in a meaningful way. The earth would not be disturbed during remodeling and there would be no change to storm water flows once the remodeling was complete.

#### 4.2.5 Solid and Hazardous Waste/Materials

Solid and Hazardous Waste/Materials would not be affected by the use of this alternative.

#### 4.2.6 ERP

The ERP could be a problem if a large quantity of Hazardous Waste/Materials is found in or around Building 4143. It is also suspected that both buildings contain Asbestos and Lead Based Paint which would have to be remediated before the buildings can be occupied for office space.

#### 4.2.7 Topography, Geology, and Soils

There would be no detrimental effect if the remodeling occurs to Topography, Geology, and Soils.

#### 4.2.8 Biological Resource Issues

There would be no detrimental effect to Biological Resources.

#### 4.2.9 Cultural Resources

The Cultural Resources (Buildings 4133 and 4143) would be preserved. The prestige of the Air Force would be enhanced by preserving the buildings and converting them to useful properties by pursuing the Alternative Action.

#### 4.2.10 Noise

The Alternative Action would have only transitory and minor effects on the noise levels in the area.

#### 4.2.11 Socioeconomic/Environmental Justice

Major social adverse effects would not occur because of this action. There would be no disproportionately high or adverse human health impacts to minority and/or low-income populations. Economically, large costs would be incurred by upgrading the two buildings. It would be approximately \$250/sq. ft to remodel each building (Tracer, personal communication, 2012). Therefore, for building 4133, the total cost would be around \$742,500 (2,970 sq. ft.), and for building 4143, the total cost would be around \$2,024,250 (8,097 sq. ft.). This is compared to \$85,000 which was the amount programmed for demolition (including a complete HABS study).

#### 4.2.12 Transportation

Transportation would be slightly elevated for the area because of commuting to and from the office area by workers and visitors.

### **4.3. No Action Alternative**

#### 4.3.1 General

Under the no-action alternative, the buildings would remain in their current location, and the property would remain abandoned and unused.

#### 4.3.2 Land Use

Land use at the existing site would remain the same.

#### 4.3.3 Air Quality

The no-action alternative would generate no particulate matter emissions due to any demolition. Air quality would remain the same.

#### 4.3.4 Climate and Hydrology

The no-action alternative would not be expected to impact surface or groundwater resources of the region.

#### 4.3.5 Solid and Hazardous Waste/Materials

No impact due to hazardous waste or materials is expected in conjunction with the no-action alternative.

#### 4.3.6 ERP

The no-action alternative would have no impact on the creation or remediation of any ERP sites.

#### 4.3.7 Topography, Geology, and Soils

Geological and soil resources are not expected to be adversely affected by the no-action alternative.

#### 4.3.8 Biological Resource Issues

Environmental impacts to biological resources are not expected from the no-action alternative. There should be no adverse affects to animal species or wetlands.

#### 4.3.9 Cultural Resources

The no-action alternative would have a positive impact on historic resources by preserving the buildings as Cultural Resources.

#### 4.3.10 Noise

The no-action alternative would not affect the noise level in the area.

#### 4.3.11 Socioeconomic/Environmental Justice

The no-action alternative would not impact the socioeconomic levels.

#### 4.3.12 Transportation

The no-action alternative would have no impact on the transportation system.

## **5.0 Cumulative Effects and Irreversible and Irretrievable Commitment of Resources**

### **5.1 Cumulative Effects**

CEQ regulations stipulate that the cumulative effects analysis within an EA should consider the potential environmental impacts resulting from “the incremental impacts of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions” (40 CFR Part 1508.7). Cumulative impacts can result from individually minor, but collectively substantial, actions undertaken over a period of time by various agencies (Federal, state, and local) or individuals. Informed decision making is served by considering cumulative impacts resulting from projects that are proposed, under construction, recently completed, or anticipated to be implemented in the reasonably foreseeable future. There was a review of public documents, information gained from the IICEP process, and other coordination with various applicable agencies. During the timeframe of the proposed action, no specific projects from the past or reasonably foreseeable future are located in the immediate vicinity of the proposed project sites.

The cumulative impact of the demolition projects combined would not be expected to result in a significant impact. The projects occur on previously disturbed areas. There are no biological or water resource issues of concern in the area. The projects do not occur on an ERP site. There would be cumulative effects for solid waste generation from demolition activities from the projects located in proximity to each other. There is no indication that the amount of non-hazardous or hazardous solid waste/material generated from the actions would have a significant impact on disposal facilities.

The kinds of general adverse environmental effects identified (for example, short-term increases in heavy equipment noise, criteria air emissions, sedimentation, or storm water runoff) in this EA would be expected for any demolition project occurring on base. These types of effects could be considered adverse when combined with other actions, but minor when considering that most projects would be spatially removed from other projects and generally short-term in character. None of the separately proposed/approved actions, by themselves, or when combined would increase the “footprint” of land disturbance on the base significantly. No significant cumulative impacts on the environment are anticipated from the proposed action in conjunction with known projects.

### **5.2 Irreversible and Irretrievable Commitment of Resources**

NEPA CEQ regulations require environmental analyses to identify “...any irreversible and irretrievable commitments of resources that would be involved in the proposed action should be implemented” (40CFR Section 1502.16). Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the effects the uses of these resources have on future generations. Irreversible effects primarily result from the use or destruction of a specific resource (for example, energy and minerals) that cannot be replaced within a reasonable time frame.

The irreversible and irretrievable commitments of resources that would result from implementing the proposed action involve the consumption of material resources used for demolition, energy resources, land, and human labor resources. The use of these resources is considered to be permanent.

**Material Resources:** Material resources used for the proposed action include demolition materials (for hauling waste). Most of the materials that would be consumed are not in short supply, would not limit other unrelated activities, and they would not be considered significant.

**Energy Resources:** Energy resources used for the proposed action would be irretrievably lost. These include petroleum-based products (such as gasoline and diesel). During demolition, gasoline and diesel would be used for the operation of demolition vehicles. Energy efficiencies associated with demolition would be expected to be negligible. Consumption of these energy resources would not place a significant demand on their availability in the region; therefore, no significant impacts would be expected.

**Biological Habitat:** The proposed action would result in no loss of vegetation and wildlife habitat.

**Human Resources:** The proposed action would result in a beneficial asset because the Air Force can take the properties off the real property inventory and legal/maintenance issues would no longer consume resources.

**Financial Resources:** The consumption of financial resources would be the costs of demolition (including HABS Level II Reports) and workers to do the job. Hauling and disposal of the wastes would also occur. However, these would be one-time costs and would be very economical compared to remodeling and maintaining the buildings for many years. Demolition would also result in taking the properties off the real property inventory.

## **6.0 LIST OF PERSONS AND REFERENCES CONSULTED**

### **PERSONS:**

Mr. Richard Parent, 2d Civil Engineer Squadron, Real Property Manager  
Mr. Gary Mackey, AFCEC, Environmental Engineer  
Mr. Wayne Walsh, 2d Civil Engineer Squadron, Base Community Planner  
Mr. David Sanders, 2d Civil Engineer Squadron, Chief, Asset Optimization  
Mr. Wallace Robertson, 2d Civil Engineer Squadron, ERP Project Manager  
Mr. Nathan Tracer, 2d Civil Engineer Squadron, Base Architect  
Mr. Andrew Baugnet, HABS Photographer  
Ms. Deborah Harvey, Preservation Consultant

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2. Barksdale Air Force Base, *National Register Evaluative Testing at Sites 16BO453, 16BO454, 16BO476, 16BO477, and 16BO531, Barksdale Air Force Base, Bossier Parish, Louisiana*, January 2009
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8. U.S. Air Force (USAF), *Environmental Assessment for Capital Improvements Program, Barksdale Air Force Base, Louisiana*, April 2008
9. AFI 32-7061: The Environmental Impact Analysis Process, 1 August 1997
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12. AFI 32-1052: Facility Asbestos Management, 5 Nov 2008
12. Barksdale Air Force Base, *Integrated Cultural Resources Management Plan*, February 2013  
Barksdale Air Force Base
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14. The Nature Conservancy Louisiana Field Office, *Threatened and Endangered Species-Natural Areas Survey*, April 1997
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16. Historic American Buildings Survey, Building 4133, Photographs, Written and Historical and Descriptive Data, Photographed Copies of Construction and Measured Drawings, HABS No. LA-1247-D
17. Historic American Buildings Survey, Building 4143, Photographs, Written and Historical and Descriptive Data, Photographed Copies of Construction and Measured Drawings, HABS No. LA-1247-E
18. Title V Property Survey, Federal Property Information Checklist, Buildings 4133 and 4143, April 18, 2011 and June 22, 2011, respectively
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20. U.S. Census Bureau, State and County Quick Facts, Bossier Parish, LA, 11 Mar 2013
21. Final Site Visit Report for Investigation of Oil Water Separators to Determine Defense Environmental Restoration Account Eligibility at Barksdale Air Force Base, Louisiana, AECOM, October 2011
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25. Poverty Thresholds for 2012 by Size of Family and Number of Related Children Under 18 Years, U.S. Census Bureau
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## **7.0 IICEP PROCESS**

The Interagency /Intergovernmental Coordination for Environmental Planning (IICEP) process is mandated by Executive Order 12372, Intergovernmental Review of Federal Programs, July 12, 1982. This policy provides for federal coordination with federal, state and local agencies to review plans and projects which require NEPA implementation.

The IICEP program has five major objectives:

- a. IICEP seeks to develop and maintain reciprocal planning and consultation procedures between the Air Force and other governmental agencies.
- b. IICEP seeks to gain public support for and understanding of the Air Force mission.
- c. IICEP seeks to encourage state and local governments to help provide various facilities, transportation services, utilities and housing needed to support installation personnel and operations.
- d. IICEP seeks to provide a process for enhanced compliance with applicable federal, state and local laws and regulations.
- e. IICEP seeks to provide a mechanism for the presentation of a unified and consistent Air Force position on environmental planning issues.

As a fulfillment of this requirement, BAFB sent copies of the draft EA to 18 federal, state and local agencies on\_\_\_\_. A copy of the letter can be found in Appendix E along with the IICEP distribution list.

## **APPENDICES**

## **Appendix A – Letter from the NPS Approving the HABS Reports**

Will be included in the Final EA

## Appendix B – Memorandum of Agreement Between the SHPO and the Air Force



DEPARTMENT OF THE AIR FORCE  
2D CIVIL ENGINEER SQUADRON (AFGSC)  
BARKSDALE AIR FORCE BASE, LOUISIANA

NOV 09 2012

MEMORANDUM FOR: STATE OF LOUISIANA HISTORIC PRESERVATION OFFICE

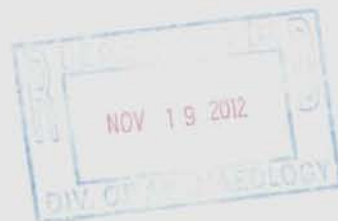
FROM: 2 CES/CEA  
334 Davis Ave West, Suite 200  
Barksdale AFB LA 71110-2078

SUBJECT: Proposed Demolition of Historic Buildings – Final MOA

1. This is a continuation of the Section 106 consultation concerning proposed projects to demolish Buildings 4133 (Empty Office Space), 4143 (Old Automotive Hobby Shop), 5163 (Storage Garage), 5175 (Storage Garage), and 5745 (Empty Storage Building).
2. Attachment is the final MOA signed by our Wing Commander. It is our understanding that the signed final MOA must be submitted to the National Park Service, Atlanta Regional Office. They should then assign permanent HABS numbers and approve the final HABS reports. We also believe that one final HABS submittal must be submitted to your office for deposition in the State Archives, and one final HABS submittal will be submitted to the Bossier Parish Historic Center Library in Bossier City, Louisiana.
3. We wish to thank Ms. Nicole Hobson-Morris your Executive Director for her help in guiding us through this arduous process. Our point of contact is Mr. Gary Mackey, phone: (318) 456-5262 email: gary.mackey.1@us.af.mil

  
SUE M. LANDRY, GS-13, DAF  
Installation Asset Manager

1 Attachment:  
Draft Final MOA



**MEMORANDUM OF AGREEMENT  
BETWEEN BARKSDALE AFB, BOSSIER PARISH, LOUISIANA AND  
THE LOUISIANA STATE HISTORIC PRESERVATION OFFICER  
REGARDING THE PROPOSED DEMOLITION OF  
BUILDINGS 4133, 4143, 5163, 5175 and 5745**

WHEREAS, Barksdale Air Force Base (BAFB) wishes to demolish Buildings 4133, 4143, 5163, 5175 and 5745 in order to eliminate excess building inventory in order to reduce Barksdale AFBs physical presence by 20 percent by 2020 in accordance with the U.S. Air Force Civil Engineer Strategic Plan, and because it is no longer economically practical to maintain old structures that have deteriorated beyond repair; **and**

WHEREAS, Buildings 4133, 4143, 5163, 5175 and 5745 are historic, are constructed during the same time period, are located in the Historic District at BAFB, and are all listed on the National Register of Historic Places; **and**

WHEREAS, BAFB has determined that the proposed demolition of Buildings 4133, 4143, 5163, 5175 and 5745 will have an adverse effect upon the Barksdale Field Historic District and has consulted with the Louisiana State Historic Preservation Officer (LSHPO) pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 USC 470f); **and**

WHEREAS, BAFB has consulted with the Advisory Council on Historic Preservation (the Council), and the Council has chosen not to participate in the consultation, with correspondence dated August 29, 2012; **and**

WHEREAS, the only federally recognized Indian tribe with interests on BAFB is the Caddo, and the Caddo have not been consulted on this action because it does not affect any known archaeological or cultural resource of Caddo heritage; **and**

WHEREAS, this undertaking will be publicized by the BAFB Public Affairs office in a press release which describes the need for the action and the location of the Historic American Building Survey (HABS) documentation for reference and review by researchers and other interested public and private entities, and final copies of all HABS reports will be deposited in the Library of Congress for permanent retention and reference; **and**

WHEREAS, definitions given in Appendix A are applicable throughout this Memorandum of Agreement (MOA);

NOW, THEREFORE, BAFB and the LSHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

## I. STIPULATIONS

BAFB will ensure that the following measures are carried out:

A. Prior to the demolition of each facility, BAFB will record each building in accordance with the (HABS) Level II Standard as stipulated in the *Secretary of the Interior's Standards for Architectural and Engineering Documentation*. BAFB provided LSHPO with an opportunity to comment on the draft HABS documentation. BAFB will prepare and submit the HABS recordation materials in consultation with the National Park Service (NPS). If it determines to accept the materials, all materials will be submitted to the Library of Congress. The HABS documentation will also be placed on file and will be available for reference by the general public in the Bossier Parish Historic Center Library, Bossier City, Louisiana. One archival copy will be submitted to the LSHPO and LSHPO will forward the material to the State Archives at 3851 Essen Lane, Baton Rouge, Louisiana. NPS has stipulated the level of documentation as Level II, and will issue final HABS numbers upon signature of this MOA by both parties.

B. An environmental analysis of the undertaking shall be prepared in accordance with the requirements of the National Environmental Policy Act (NEPA) of 1969 and the Council of Environmental Quality (CEQ) regulations implementing NEPA. It will also be prepared as specified in 32 CFR Part 989. NEPA does require public participation and comment on the proposed undertakings.

## II. DISPUTE RESOLUTION

A. Should any signatory party to this MOA object to any action carried out pursuant to this MOA, BAFB shall consult with the SHPO to resolve the objections.

B. If BAFB and the SHPO determine that the objection cannot be resolved, BAFB and the SHPO shall forward documentation relevant to the dispute to the Council within 30 days after receipt of all pertinent documents, the Council will either:

1. Provide BAFB and the LSHPO with recommendations, which BAFB and the SHPO will take into account in reaching a final decision regarding the dispute;

2. Notify BAFB and the LSHPO that it will comment pursuant to 36 CFR 800.7(c) and proceed to comment. Any Council comment provided in response to such a request will be taken into account by BAFB and the LSHPO in accordance with 36 CFR 800.7(c)(4) with reference only to the subject dispute.

C. If the Council does not provide BAFB with comments or recommendations, BAFB may assume that the Council does not object to its recommended approach and it shall proceed accordingly.



D. Any recommendation or comment provided by the Council shall be understood to pertain only to the subject of the dispute, and BAFB's responsibilities to fulfill all actions that are not subject of the dispute shall remain unchanged.

### III. AMENDMENTS, TERMINATION AND NONCOMPLIANCE

A. Any Signatory or Invited Signatory may request in writing that the MOA be amended or terminated. Within 21 days of such a request, BAFB will make a good faith effort to amend the MOA prior to any party taking steps to terminate it. The MOA may be amended only upon the written agreement of the Signatories, and the process will comply with 36 CFR 800.6(c)7.

B. If the MOA is not amended, the Signatories may terminate the MOA by providing a 30-day written notice to the other consulting parties. These parties will consult during this 30-day time frame to seek amendments or other actions that would prevent termination. Should consultation fail, BAFB will promptly notify the other parties in writing of termination. This MOA may be terminated without further consultation by execution of a subsequent agreement that explicitly terminates or supersedes this MOA.

### IV. DURATION

If measures specified in the previous section have not been implemented by the end of calendar year 2014, BAFB and the SHPO shall review this MOA to determine whether revisions are needed. If revisions are needed, BAFB and the SHPO will consult with 36 CFR Part 800 to make such revisions.

### V. EFFECTIVE DATE AND IMPLEMENTATION OF MOA

This MOA shall become effective immediately upon signature by the Signatory Parties. BAFB shall provide each Signatory Party with a complete copy of the MOA including all executed signature pages. In addition, a final copy shall be submitted to the Advisory Council.

### VI. EXECUTION AND IMPLEMENTATION

Execution of the MOA is evidence that BAFB has afforded the LSHPO a reasonable opportunity to comment on the Undertaking and its effects on historic properties, that BAFB has taken into account the effects of the Undertaking on historic properties, and that BAFB has satisfied its responsibilities under Section 106 of the National Historic Preservation Act and applicable implementing regulations.

BARKSDALE AIR FORCE BASE

By:  Date: 3/09/2012  
ANDREW J. GEBARA, Colonel, USAF  
Commander, 2d Bomb Wing

LOUISIANA STATE HISTORIC PRESERVATION OFFICER

By:  Date: 11-26-12  
PAM BREAU, Louisiana Historic Preservation Officer

## APPENDIX A

### DEFINITIONS

Documentation - The process of documenting a historic property through photography, historic research, and architectural drawings

HABS Level II Documentation - Documentation in accordance with the Historic American Buildings Survey/Historic American Engineering Record standards published in the *Federal Register*, Vol. 48, No. 190, p. 44732, 29 September 1983. It includes:

- (1) Drawings: select existing drawings, where available, should be photographed with large-format negatives or photographically reproduced on Mylar.
- (2) Photographs: photographs with large-format negatives of exterior and interior views, or historic views, where available.
- (3) Written data: history and description.

## Appendix C – Letter from the Advisory Council on Section 106 Consultation



Preserving America's Heritage

August 29, 2012

Ms. Sue M. Landry  
Installation Asset Manager  
Department of the Air Force  
2 CES/CEA  
334 Davis Avenue, Suite 200  
Barksdale Air Force Base, LA 71110

***Ref: Proposed Demolition of Buildings 1359, 4133, 4143, 5163, 5175, and 5745  
Barksdale Air Force Base, Louisiana***

Dear Ms. Landry:

On June 21, 2012, the ACHP notified you of our determination that we would not participate in the Section 106 consultation regarding the referenced undertaking. Our letter inadvertently omitted the demolition of building 4143 from the description of the undertaking and incorrectly identified building 5163 as building 5155. This letter clarifies and restates that we will not participate in the Section 106 consultation regarding the proposed demolition of buildings 1359, 4133, 4143, 5163, 5175, and 5745 at Barksdale Air Force Base.

Pursuant to 36 CFR 800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the Louisiana State Historic Preservation Officer (SHPO) and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the Agreement and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have any questions or require further assistance, please contact Katry Harris at 202-606-8520, or via email at [kharris@achp.gov](mailto:kharris@achp.gov).

Sincerely,  
Raymond V. Wallace  
Historic Preservation Technician  
Office of Federal Agency Programs



**Appendix D – Building 4133 Shortly After Construction (September 13, 1934)**



**Appendix E – Building 4133 Interior (September 13, 1934)**

## Appendix F – IICEP Letter and Distribution List

Example of Letter To Be Sent Out



### DEPARTMENT OF THE AIR

#### FORCE

2D CIVIL ENGINEER  
SQUADRON (AFGSC)  
BARKSDALE AIR FORCE BASE.  
LOUISIANA

NOV 08 2012

#### MEMORANDUM FOR IICEP DISTRIBUTION LIST

FROM: 2 CES/DCE

334 Davis Ave West, Suite 200

Barksdale AFB LA 71110-2078

SUBJECT: Environmental Assessment – Building 5745 Historic Building Demolition

1. Barksdale Air Force Base proposes to demolish Building 5745 which is an historic building and is listed on the National Register of Historic Places. In accordance with the Air Force policy of Interagency/Intergovernmental Coordination for Environmental Planning (IICEP) we are notifying you of this proposed action. As a requirement of IICEP we wish to consult with you, and we request your comments on this project.

2. Enclosed is a CD of the draft Environmental Assessment in Microsoft Word format (Attachment). We request your comments within 30 days of your receipt. Please return comments to:  
2 CES/CEAO, ATTN: David Sanders, 334 Davis Ave. W, Suite 206, Barksdale AFB, LA 71110.

3. The authority for IICEP can be found in the Intergovernmental Cooperation Act of 1968, Section 401(b), the National Environmental Policy Act of 1969, Section 102(2) (c), and Executive Order 12372, *Intergovernmental Review of Federal Programs*, July 12, 1982.

4. Our point of contact is Mr. David Sanders, Element Chief, Asset Optimization phone: (318) 456-5296 Email: david.sanders.3@us.af.mil.

A handwritten signature in blue ink, reading "Steven S. Vincent", is located below the contact information.

STEVEN S. VINCENT, PE, GS-14, OAF  
Deputy Base Civil Engineer

2 Attachments

1. Environmental Assessment-Building 5745 Historic Building Demolition
2. Barksdale AFB IICEP List



## **BARKSDALE AFB IICEP LIST**

(current as of April, 2013)

The Honorable David Vitter  
U.S. Senator, Louisiana  
920 Pierremont Rd., Suite 113  
Shreveport, LA 71106

The Honorable Mary Landrieu  
U.S. Senator, Louisiana  
300 Fannin St., Room 2240  
Shreveport, LA 71101

The Honorable John Fleming  
U.S. Representative Louisiana 4th Congressional District  
6425 Youree Drive, Suite 350  
Shreveport, LA 71105

The Honorable Robert Adley  
Louisiana State Senator  
36th Senatorial District  
611 Jessie Jones Dr.  
Benton, LA 71006

The Honorable Barrow Peacock  
Louisiana State Senator  
37<sup>th</sup> Senatorial District  
1619 Jimmie Davis Hwy.  
Bossier City, LA 71112

The Honorable Jeff R. Thompson  
Louisiana State Representative 8th Representative District  
1527 Doctors Drive  
Bossier City, LA 71111

Mr. David Rockett,  
Executive Director,  
Greater Bossier Economic Development Foundation  
710 Benton Road  
Bossier City, LA 71111

The Honorable Lorenzo “Lo” Walker  
Mayor, City of Bossier City  
620 Benton Road  
Bossier City, LA 71171-5337

The Honorable Rick Avery  
Bossier Parish Police Jury  
P.O. Box 70  
Benton, LA 71006

Mr. Bob Brown, Director  
Community Development  
City of Bossier City  
620 Benton Road  
Bossier City, LA 71171-5337

Mr. William R. Altimus  
Bossier Parish Administrator  
P.O. Box 70  
Benton, LA 71006

Mr. Cliff Oliver  
Chief Administrative Officer  
620 Benton Road  
P.O. Box 5337  
Bossier City LA 71171-5337

Mr. Sam Marsiglia  
Metropolitan Planning Commission  
620 Benton Road  
P.O. Box 5337  
Bossier City, LA 71171-5337

The Honorable Cedric B. Glover  
Mayor, City of Shreveport  
505 Travis Street, Suite 200  
Shreveport LA 71101

Mr. Arthur Thompson  
Shreveport Clerk of Council  
City of Shreveport  
505 Travis Street  
Shreveport, LA 71101

Mr. Dale Sibley  
Chief Administrative Officer  
Caddo Parish  
P.O. Box 1127  
Shreveport, LA 71163-1127



## DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 2D BOMB WING (AFGSC)  
BARKSDALE AIR FORCE BASE LOUISIANA

MAY 14 2013

MEMORANDUM FOR CADDO TRIBE OF OKLAHOMA  
ATTENTION: HONORABLE BRENDA SHEMAYME  
EDWARDS  
Chairperson of the Caddo Nation

FROM: 2 BW/CC

SUBJECT: Environmental Assessment – Buildings 4133 and 4143 Historic Building  
Demolitions

1. In accordance with Executive Order 13175, Consultation and Coordination with Indian Tribal Governments, November 6, 2000, and Presidential Memorandum on Government-to-Government Relationship with Tribal Governments, September 23, 1994, we are enclosing the draft Environmental Assessment for Building 4133 and 4143 Historic Building Demolitions.
2. We believe that no items of cultural value to the Caddo will be discovered during the demolition, however, if there is an inadvertent discovery of Native American human remains or funerary items, the Air Force will closely follow the stipulations set forth in the *Comprehensive Agreement Between Barksdale Air Force Base (AFB), Louisiana and the Caddo Indian Tribe of Oklahoma (Caddo Nation)*, date: 8 May 2002 and the *Native American Graves Protection and Repatriation Act of 1990* (P.L. 101-601, 104 STAT. 3048, 25 USC 3001-3013 and 43 CFR 10).
3. We request your comments within 30 days of receipt of this letter. Our Point of Contact is Mr. Wayne Walsh, 2 CES/CEAO, base Cultural Resources Manager, (318) 781-4064, email: timothy.walsh.10@us.af.mil.

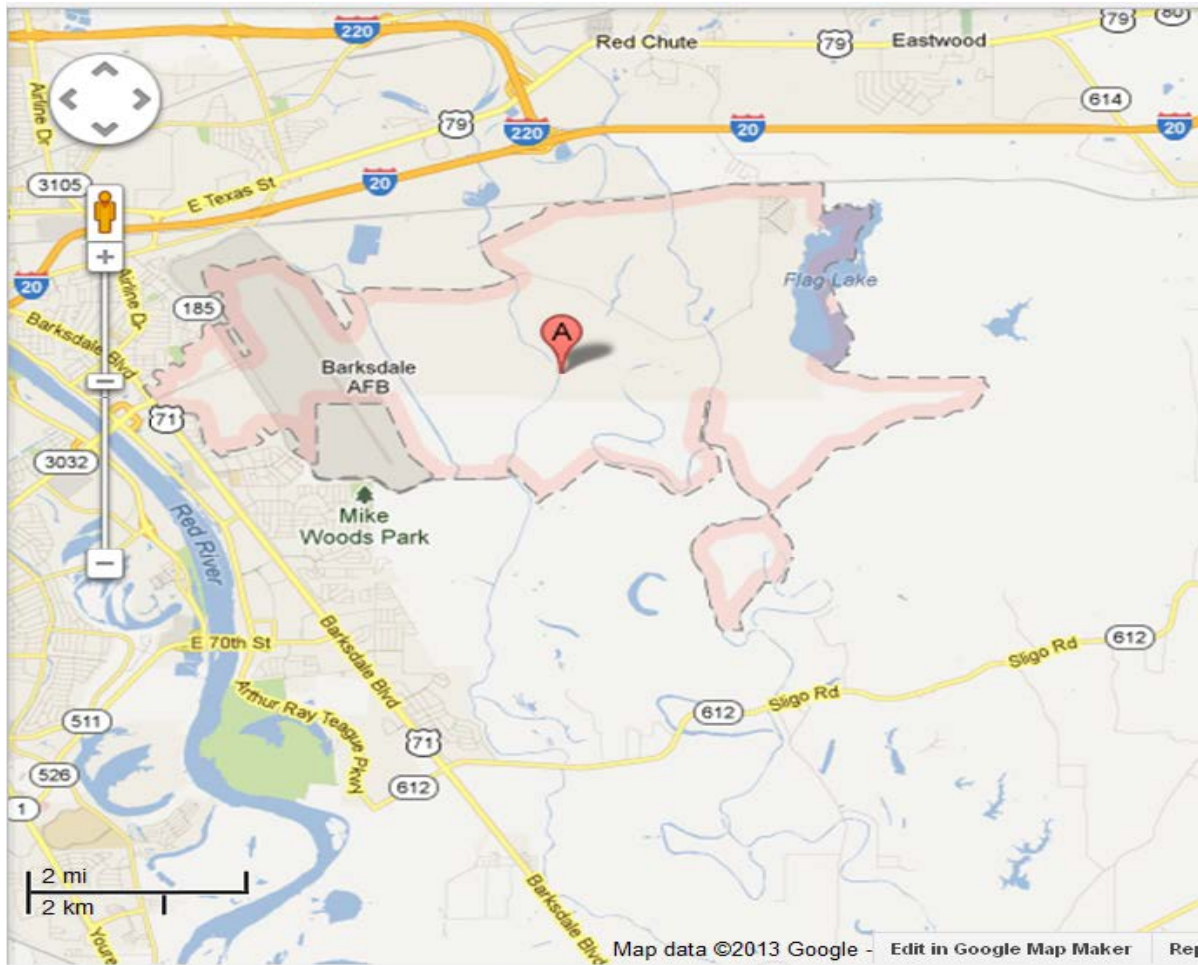
  
ANDREW J. GEBARA, Colonel, USAF  
Commander

Attachment:  
Environmental Assessment

## **Appendix G – HCEP Agency Correspondence**

Will be included in the final EA

## Appendix H – Environmental Justice Data and Analysis



**Map of Zip Code Area 71110**

An Environmental Justice evaluation would consist of as many as 10 steps. Step 1 would be NEPA Scoping. This is making an effort to identify and include minority and low-income populations in the process. Step 2 would be to determine if there is an impact caused by the proposed action. If no, then no analysis is required. If yes, then Step 3 would be to determine if the impact is adverse. If no, no further analysis is required. If yes, Step 4 would be to map the footprint showing where each adverse impact would occur. Step 5A would be to identify the smallest political unit(s) that encompass the impact footprint. This is defined as the Community of Comparison (COC). Step 5B would be to identify the census tracts that underlie each impact footprint. Step 6 would be to calculate and compare the percent minority and percent low-income populations in the COC and in each census tract. Step 7 would be to determine if the census tract percent is equal to or less than the COC percent. If so, then there is no disproportionate effect. Step 8 would be to declare no disproportionate effect. Step 9 would be used if there is a presumed disproportionate effect and conduct field verification to confirm that affected census tracts do contain residential areas. Step 10

would be to describe the difference between the percentages (disproportionally) and suggest potential mitigation for the decision makers.

The first step would be to determine the smallest area of population. This area is the Community of Comparison, and it is Zip Code 71110. It can be shown on the map on page 54. This area encompasses most of Barksdale Air Force Base. The 2010 U.S. Census determined that there were 2,764 people residing in this COC in 2010 (U.S. Census Bureau). Furthermore, the table below shows the minority distribution with this COC in 2010.

Subject Group	Number
White	2,435
Black or African American	300
American Indian and Alaska Native	0
Asian	202
Native Hawaiian and Other Pacific Islander	63
Some Other race	5
Hispanic or Latino (of any race)	227
Two or more races	109
Total (Non-White)	906

Source: U.S. Census Bureau, 2010 Demographic Profile Data, Zip Code 71110, 2010 Census

The number of non-white (minority) people in the COC is 906, or about 37% of the total population of the COC. There are not a disproportionate number of minorities in the COC.

According to data from the U.S. Census Bureau the poverty threshold for a family of 4 in the U.S. in 2011 was \$23,021. The table below lists the household income for a family of 4 from this COC in 2011.

Income & Benefits (in 2011 Inflation Adjusted Dollars)	Number
Total Households	678
Less than \$10,000	28
\$10,000 to \$14,999	20
\$15,000 to \$24,999	109

Source: U.S. Census Bureau, 2007-2011 American Community Survey 5-Year Estimates, Zip Code 71110

According to the U.S. Census Bureau data, the total number of households below the poverty level in the COC is around 157, or approximately 23% of the total population.

The second step is to determine whether environmental impacts will result from the proposed action. While there are some minority and low-income populations present within the COC, the environmental impact analysis reveals that the proposed action will have no significant environmental impacts. Environmental justice analysis is necessary only if the environmental impact analysis indicates that there may be impacts; if there would be no environmental impacts on human populations, then there would be no disproportionate impacts on minority or low-income populations.

(Guide for Environmental Justice Analysis with the Environmental Impact Analysis Process (EIAP), Air Force, November 1997.) Therefore, a full environmental justice analysis is not required.